

O The Applied Discovery OrangePages

Electronic Discovery Newsletter

FEATURE STORY

Begin Electronic Discovery Planning Now

One of the most difficult discovery issues facing attorneys today is the challenge of developing a uniform approach for handling electronic discovery in an efficient, effective manner. A few years ago, electronic discovery was a new concept and most law firms approached each electronic document request as a unique project. Learning where their clients stored electronic data and how to best collect and review it was a daunting task—especially for a non-technical profession. Attorneys frequently made up their electronic discovery strategy as they went along, typically starting from scratch with each new case. This approach will no longer

suffice. There is no doubt that electronic discovery is here to stay, and attorneys now need a uniform, well-planned approach for gathering, reviewing, marking and producing electronic discovery documents.

Assistance provided by your electronic discovery service provider should include the following:

- ✓ **Analysis of Document Requests**
To determine extent and location of electronic data to be reviewed.
- ✓ **Data Gathering Services**
Including guidance for internal IT resources or on-site, third party assistance.
- ✓ **Media Restoration**
Retrieving information from backup tapes or legacy systems.
- ✓ **Online Document Review**
With sophisticated search functionality and a user-friendly interface.
- ✓ **Flexible Document Production Options**
To allow production in electronic or paper format.

To be successful, attorneys must please two audiences: the courts and their clients. Both of these groups are keenly interested in knowing that a firm has the proper electronic discovery protocols in place, and can effectively manage the electronic discovery component of any case. The importance of early

planning is underscored by recent decisions

See Feature on Page 5

CASE LAW UPDATES

Sanctions May be Issued for Ordinary Negligence in Electronic Discovery

Residential Funding Corp. v. DeGeorge Home Alliance, Inc., 2002 U.S. App. LEXIS 20422 (2nd Cir. September 26, 2002).

This appeal presented a single issue: whether the trial court properly denied defendants' request for an adverse inference instruction after the plaintiff (RFC) failed to produce requested emails in time for trial. The appeals court vacated the judgment for plaintiff, holding that an adverse inference instruction could be an appropriate sanction for ordinary negligence—not only for gross negligence or bad faith, as the district court had held.

Besides applying this incorrect legal standard, the district court had found no evidence that the emails would have been damaging to RFC. The appeals court admonished that a requesting party should not be held to a too-stringent standard in proving the nature of missing evidence. It cited the following indications that the emails would have damaged RFC's case:

- RFC told the court that the emails would be produced, but did not reveal that its vendor had been unable to retrieve emails from the critical time period;
- When defendants eventually retained their own vendor to examine the tapes, RFC exacerbated the delay by missing a deadline to ship the tapes to defendants' vendor;
- RFC refused to provide information to assist defendants' vendor in analyzing the tapes.

The court acknowledged that the ultimate cause of non-production was RFC's vendor's inability to retrieve the emails, but authorized sanctions against RFC for its own actions hindering production.

The court also noted that the district court "overlooked" evidence indicating bad faith

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CONTACT US

Applied Discovery is pleased to announce the expansion of its Washington, D.C. office. Increased business related to electronic document review in Second Requests in mergers and acquisitions has driven the growth of this office. This larger, centrally located office will allow Applied Discovery to continue to provide first-rate service and support to clients in the Washington area.

Our West Coast Headquarters is outside Seattle in Bellevue, Washington. Our East Coast Headquarters is in Midtown Manhattan. We have regional offices in Washington, D.C., Houston and Chicago.

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★ Regional Headquarters ■ Regional Offices

PRACTICE TIPS

Five Tips for Developing an Effective Electronic Discovery Response Plan

1. Form a strategic partnership between inside and outside counsel

- Focus on preventative maintenance for electronic data management.
- Plan for electronic document production protocol.
- Share and learn from collective experiences.

2. Familiarize legal team with IT practices

- Lawyers are not expected to have detailed technical knowledge, but must be familiar with IT practices and procedures relevant to possible production of electronic data.
- Identify IT contacts that will be key to understanding technical systems for electronic document production (IT management as well as IT staff responsible for carrying out backup procedures, etc.).
- Be prepared to inventory IT systems, including operating systems, all software and hardware in use, backup schedules, segregation of data, etc.
- Educate your team about the types of electronic documents most frequently requested.
- Assist IT department in planning for document requests with effective storage and retrieval procedures.

3. Stay advised of changes in electronic discovery law

- Changing scope of electronic document production obligations.
- Issues particular to local jurisdictions.
- Duty to preserve and produce electronic data (avoid spoliation claims).
- Review changes in case law at Applied Discovery's online Law Library (<http://www.applieddiscovery.com>).

4. Designate and train a 30(b)(6) witness to answer technical questions

- Advise witness of legal importance of data storage/backup procedures and data retention/destruction protocols.
- Inventory IT systems, including operating systems, all software and hardware in use, backup schedules, segregation of data, etc.
- Develop clear outline of IT roles and responsibilities as they may relate to legal issues and electronic document production obligations.
- Explain significance of coordination between technical needs and legal needs.

5. Leverage technology in electronic discovery practices

- Minimize disruptions to business operations by leveraging technology—not manual labor—in document-intensive cases.
- Gain strategic advantage over those not utilizing electronic discovery technologies.
- Improve data storage, retrieval, organization and searching capabilities.
- Reduce time and money spent in preparing electronic documents for production.

PRODUCTION UPDATE

In the last issue of the Orange Pages, Evans Roth, Applied Discovery's VP of Production Services, reported that the Production team had reached a significant processing milestone: 2 million pages of client data per day. Thanks to continuing advances in our Production systems, the production capacity at Applied Discovery has increased by 50%, and is now:

3 million pages per day

Congratulations to the Production team for reaching a new milestone!

Discovery Database or Trial Notebook?

Dear Miranda,

My firm already uses Summation. Why would we need Applied Discovery for electronic discovery projects?

Emma N.
Los Angeles

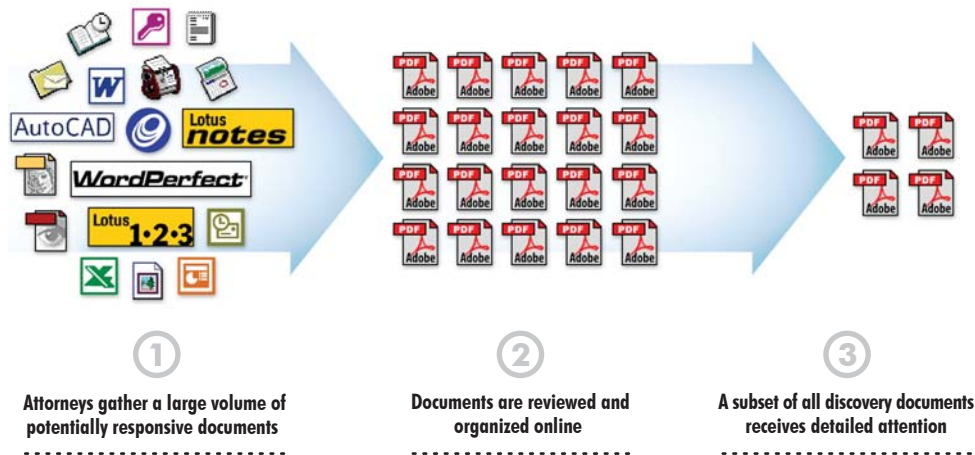
Dear Emma,

The first thing to understand is that case management software such as Summation or Concordance and electronic discovery services such as those offered by Applied Discovery are two different things. Put another way, a trial notebook is not a document warehouse.

base that links pleadings, deposition transcripts, a case chronology, exhibit records, etc. This investment of time, effort, and expense pays off when you need a robust trial support database.

The problem is that it doesn't make sense to prepare all documents for trial before attorney review has even begun. It almost certainly means delays and wasted resources, since more than 97% of all cases settle before trial. Even worse, attorneys cannot begin document review until the database is ready—a process that can take months.

You need to gather, prioritize, review and organize documents long before you need a comprehensive tool that provides a detailed analysis of every document. In fact, only a small subset of the original document set warrants the investment



When you create a Summation or Concordance database, you are generally preparing for a trial. Indeed, Summation and Concordance are great trial support tools—but they are not the logical first step in discovery response. Considering the volume of documents created electronically, you need a way to sort and prioritize documents before allocating further attention and resources to them.

Think about what usually goes into preparing documents for a Summation or Concordance database. First, every electronic document is printed. A review team then reads and subjectively "codes" the documents—that is, they categorize and summarize each one. Electronic images of the documents—usually in PDF or TIF format—are then created for viewing. Eventually, the documents are uploaded into a comprehensive data-

base required to upload to a trial support database. Applied Discovery can help you gather, prioritize, review and organize electronic documents. Using our service, attorneys can quickly narrow the entire document set to identify potentially responsive documents, while reserving the remaining universe of documents for further consideration, if necessary. They can then begin the actual review process in a matter of days, quickly find the most important documents, determine what must be produced, and make informed decisions about how best to proceed.

Eventually, if necessary, Applied Discovery can export a working set of documents to your Summation or Concordance database. Finding those documents in the first place is much easier when true electronic discovery services are employed.

THE PROVEN INDUSTRY LEADER

Applied Discovery is proud of its reputation as a leading national technology company. Our pioneering technology and service standards set us apart from the competition, and have been recognized with a number of industry accolades. Some recent examples:

Applied Discovery's founders were named as finalists for the 2002 Ernst & Young "Entrepreneur of the Year" award. This award recognizes business leaders who have developed new technologies, created faster ways to distribute goods and services, and improved the quality of life for people around them.



Our client service standards have also received industry accolades and recognition. Applied Discovery was selected as one of just three finalists for the Washington Software Alliance 2001 "Service Provider of the Year" honor. The Service Provider of the Year honor is awarded to:

"... the company that regularly exceeds client expectations, demonstrating the most exemplary service through a strong use of technology to bring extraordinary quality, creativity and responsiveness to clients."



Miranda Glass is Educational Programs Manager at Applied Discovery. She answers questions from readers in each issue of the Orange Pages. You can submit a question to her at miranda.glass@applieddiscovery.com.

COURT RULES UPDATE

Does your jurisdiction have local rules specific to electronic discovery? The following states have adopted rule changes to handle electronic discovery differently from traditional discovery.

Local Rules - Federal Courts

- **District of Wyoming Local Civil Rule 26.1(d)**
Counsel must carefully investigate their clients' information systems. In particular, attorneys must know how information is stored and how it can be retrieved, and must review contents of client files, including legacy data.
- **Eastern and Western Districts of Arkansas Local Rule 26.1**
The Rule 26(f) report must specify information related to electronic discovery. The parties are to agree to the format, media, and procedures for production. Each must disclose whether "reasonable measures" have been taken to preserve potentially discoverable evidence.
- **Middle District of Florida Local Court Rule 3.03(f)**
This jurisdiction requires that attorneys use technology to the maximum extent possible in all phases of litigation.

State Rules of Civil Procedure and State Court Rules

- **California Code of Civil Procedure Section 2017**
The California Code specifically provides that discovery may be conducted in electronic media and by electronic communication, and authorizes courts to enter orders regarding use of technology in discovery.
- **Texas Rule of Civil Procedure 196.4**
Only responsive information that is "reasonably available to the responding party in the ordinary course of business" must be produced. The responding party has an opportunity to object to any request calling for information that cannot be produced by "reasonable efforts." If the court then orders production, it must order that the requesting party pay costs of "extraordinary steps" required for production.

To read complete summaries of these rules and to stay up to date on any other rule changes, visit our online Law Library at www.applieddiscovery.com. The Law Library is updated monthly. ■

SPOTLIGHT

Search Functionality Targets Critical Evidence with Unparalleled Precision

This issue's Spotlight column features an interview with Scott Nagel, Director of Client Solutions at Applied Discovery. The Client Solutions Group is made up of Account Managers with a variety of professional backgrounds, including former practicing attorneys, paralegals, litigation support professionals and experienced IT managers. Each Applied Discovery client has a dedicated Account Manager who is responsible for every project related to that client, ensuring one consistent point of contact for client training and support.

The Orange Pages (TOP): Scott, we've heard that the Client Solutions Group has been busy training clients on some features recently introduced in the company's Online Review service. Tell us what's new.

Scott Nagel (SN): The most exciting new features are related to our search functionality. Our clients have always had the ability to search the complete content of their documents using Boolean searches, and have been able to search documents according to date ranges, document custodians, etc. Some new developments in our service go beyond traditional search methods, however, and make it possible to search by a document's complete meta data and the so-called "parent-child" relationships between email messages and their attachments. From

a searching perspective, this opens up a whole new world of possibilities.

TOP: We hear a lot about meta data these days—and most people understand what meta data is—but can you tell us what this means in the context of searching documents?

SN: Unlike text, which is visible on the document when printed, meta data is the information behind the face of every document that is lost when an electronic document is reduced to paper. A document's text tells you what it says, while meta data tells you about the document's behavior—what it did.

For example, every Outlook email message includes over 90 fields of meta data that are transparent to the user. This includes the identity of carbon copy and blind carbon copy recipients, date sent, date received, original author, etc. Searching on meta data, Applied Discovery's clients can now locate documents with unprecedented accuracy. Consider the implications of being

able to search by very detailed criteria, including: file type; email subject line or document file name; original file path; document author; email distribution (including to, from, cc and bcc); document custodian; and date ranges

See Spotlight Page 7



Scott Nagel and company provide client training and support.

E-DISCOVERY RESOURCES

Applied Discovery's Web site contains a wealth of information related to the law and practice of electronic discovery. The following White Papers and articles are an example of the content available online. Please contact us for a complimentary copy, or view them in our online Law Library at www.applieddiscovery.com. The Law Library is updated monthly.

- **Planning an Effective Electronic Discovery Response**
An overview of the state of electronic discovery law, with an outline for preparing an effective discovery response plan.
- **Applied Discovery Security and Infrastructure**
Physical security environment and information security environment explained in detail.
- **Federal Courts Go Electronic and Mandate PDF for E-Filing: the Case Management/Electronic Case Files Project**
A summary of the current state of the federal courts' electronic filing initiative.

Understanding the Difference Between Computer Forensics and Data Gathering

As the field of electronic discovery has evolved over the past several years, there has been increasing confusion about the difference between computer forensics—a specialized application of scientific principles and practices—and data gathering, the process for collecting documents and other electronic evidence from computers. Without understanding the differences between these services, many attorneys have paid to retain "forensics experts" in cases involving electronic discovery, when all they really needed was some good advice or hands-on assistance with collecting electronic files from their clients' computers.

other transportable media. These forensically sound practices will ensure that meta data is not altered when data is copied from its original location. They will also help attorneys understand how best to save and store the copied information for use with electronic discovery review tools.

In other cases, attorneys may need on-site assistance to collect data from multiple physical locations or to assist with chain of custody tracking. In these circumstances, chain of custody tracking would include detailed documentation of the data collection procedures, who had custody of the

	Computer Forensics	Data Gathering
Goal	To locate hidden or deleted files.	To capture potentially responsive documents.
Tools Required	Highly specialized, expensive hardware and software.	Relatively inexpensive tools utilized by most client IT departments.
Expertise Required	Computer forensics experts.	IT staff trained by or assisted by electronic discovery service provider.
Relative Expense	Can cost thousands of dollars to analyze a single hard drive.	Cost efficient methods employed to leverage the client's own resources.

Think of computer forensics as taking an "autopsy" of a computer hard drive. The science of computer forensics can be of great value in certain circumstances. For example, allegations of attempts to delete incriminating documents from a computer may be confirmed or refuted with the assistance of a forensic expert. Similarly, information from computer equipment damaged in a fire or flood may be recoverable with the assistance of a forensic data recovery expert. A forensic investigation can take heroic efforts and many hours of an expensive consultant's time to find the electronic needle in the haystack. Fortunately, most cases involving electronic discovery do not warrant such a burdensome expenditure.

electronic data, who collected it from its original location, and where the data was located when collected. Further tracking measures should include application of bar codes to individual pieces of media and storage in a secured evidence room.

Electronic discovery often presents unique circumstances that depend on how well the client's documents are sorted and organized in the ordinary course of business. Your electronic discovery service provider should be able to advise you on how best to approach the particular circumstances of a given case.

Further Reading: The following materials are available for further reading. Please contact us at the address below to request a copy.

- "Creating a Data Retrieval Plan"
- "Chain of Custody Logging"
- "Transporting Media Safely"

Many attorneys facing an electronic discovery request need only basic assistance with data gathering. While it is critical to employ forensically sound data collection practices, in many cases, this may be as simple as providing procedures for how to intelligently and safely copy data from a computer hard drive to a CD-ROM, tape, or

such as that by the 2nd Circuit Court of Appeals in *Residential Funding Corp.* and the D.C. District Court in *Cobell* (see Case Law Updates). Facing the possibility of severe discovery sanctions, attorneys are compelled to plan for electronic discovery differently than for traditional discovery.


The 2nd Circuit's ruling in *Residential Funding* highlights the importance of early and effective electronic discovery planning, and illustrates how neglecting to consult a skilled electronic discovery service provider early in a case can be fatal. Attorneys need professional guidance to understand how electronic data is appropriately gathered, reviewed and produced to meet their discovery obligations. Aware of the growing number of electronic discovery service providers, courts expect that competent assistance will be sought.

Clients are also asking about a firm's electronic discovery expertise with increasing regularity. Fearful of experiencing electronic document embarrassments—and the media have reported on many in the past year—business leaders are demanding that their outside counsel demonstrate electronic discovery experience and expertise.

Today, many firms have members of the litigation support staff devoted to managing electronic discovery projects, and the more tech-savvy law firms have attorneys in electronic discovery practice groups. Developing a uniform approach within the firm has a significant impact on its ability to manage firm resources more effectively when electronic discovery is at issue in a case. This also provides the firm with a powerful marketing tool and competitive edge in attracting and retaining key clients.

The first step to developing a uniform approach to electronic discovery is to begin a dialogue with a skilled service provider. In doing so, attorneys can shortcut the electronic discovery learning curve by implementing a proven blueprint at their firm. In this process, lawyers gain all the advantages of electronic discovery without suffering the hard lessons of what not to do along the way.

Applied Discovery provides a complete line of electronic discovery services for litigation or mergers and acquisitions. Processing as many as 3 million pages per day and handling more than 200 electronic file types, we provide our clients with a consistent, cost-effective strategy for handling electronic discovery in any case. ■

 This issue's Tech Tips column was written by Carmen Oveissi, a Senior Engineer at Applied Discovery. If you have a technical issue you'd like to see addressed in this column or if you would like to request a copy of the materials referenced above, please contact us at OrangePages@applieddiscovery.com. ■

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CASE LAW UPDATES (continued from Page 1)

or gross negligence. It questioned RFC's "continued reliance on [the vendor] throughout months of apparently fruitless attempts to retrieve the critical emails" and pointed out the "discrepancy in competence" between the parties' vendors: defendants' vendor was able to identify and begin retrieving the emails in four days. (The court found "thoroughly unconvincing" the argument that the second vendor had a "head start.") RFC made inconsistent representations about how quickly it had retained help upon learning that it could not retrieve the emails "in-house." RFC produced emails dated before and after the time critical to the dispute, but not those from the critical time period. Finally, considering the circumstances—trial was imminent and RFC had delayed production—RFC's "purposeful sluggishness" might have been sanctionable misconduct in its own right.

Court Quashes Subpoena to Third Parties for Emails Available from Defendant

Braxton v. Farmer's Ins. Group, 2002 U.S. Dist. LEXIS 18005 (E.D. Ala., September 13, 2002).

Plaintiff brought this case under the Fair Credit Reporting Act and sought emails from third parties—specifically, individual agents of the defendant insurance company. The defendant objected, claiming that enforcement of the subpoena would subject the agents to an undue burden, since the emails requested were sent by the defendant and could be retrieved from the defendant's own files. The court quashed the subpoenas, crediting the defendant's assertion that it was fully able to locate and produce relevant emails sent to its agents. Absent a showing that the defendant's production was inadequate, the court did not require non-party agents to engage in the "arduous task" of combing through their emails.

Request for Database Did Not Call for a 'Search'

The Hartford Courant Co. v. Freedom of Information Commission, 801 A.2d 759; 2002 Conn. LEXIS 274 (July 23, 2002).

Under the Connecticut Freedom of Information Act (FOIA), the Hartford Courant requested from the Connecticut Department of Public Safety an electronic copy of the public portion of all of the Department's criminal history records. At issue was the amount the Courant should pay—\$20.4

million, by the Department's calculation, or only the actual cost of production.

The trial court found for the Department, reasoning that the request would require the Department to create a document that did not previously exist. State employees had testified that they would have to write a new computer program to separate public information from exempt information in the database. The court found this task outside the scope of the Department's FOIA obligation.

The Connecticut Supreme Court reversed: responding to the request, it held, would not require creation of a new document, but only production of information the Department already had in its computer storage system. The court distinguished a digital copy of information in a database from a search for specific convictions.

The agency faced specific costs in developing technology to segregate exempt records from those to be produced. The court ordered the agency to develop a program or contract with an outside vendor to do so, but held that the newspaper must bear those added costs.

Email Must be Produced in Electronic Format

Cobell v. Norton, 206 F.R.D. 324, 2002 U.S. Dist. LEXIS 5292 (D.D.C., March 29, 2002).

The court ordered defendants in this action to restore backup tapes to produce certain emails. Defendants requested "clarification" of the court's order. Specifically, they requested permission to produce the emails in paper form. The defendants had already advanced this argument twice without success. The court apparently had heard enough: it not only denied the defendants' request, but sanctioned them for making it. It quoted a Special Master appointed in the case: "[T]here can be no 'genuine dispute' that [defendants'] attempt to again seek clarification under the guise of changing conditions was inappropriate." It imposed upon defendants the plaintiffs' costs and fees incurred in responding to the request.

For full summaries of the cases noted above and a complete listing of cases related to the law of electronic discovery, visit our online Law Library at www.applieddiscovery.com. Our Law Library is updated monthly, and also features court rules summaries, white papers, articles and other educational materials related to electronic discovery. ■

SPOTLIGHT (continued from Page 4)

(including date sent, date received and last modification date). Search results can then be sorted by various criteria, including document custodian; file path; last modification date; document identification number; parent-child relationship; number of pages; and file size. This kind of functionality can be critical in the review process. For example, when reviewing documents, it is often as important to know where the document "lived" in the custodian's computer files as it is to know what the face of the document said. Sorting documents in various ways can also provide a clear picture of how certain evidence fits together in a case.

TOP: It sounds like powerful search technology, but doesn't that kind of information harm your clients as often as it helps them?

SN: That's a common misconception. But the ability to search document meta data is equally important in building both sides of a case—whether a party is asserting or defending against a claim. For example, a party may need to quickly search for all email messages authored by certain company executives during a particular time period. Meta data searches enable just that. We've all read the recent headlines about things said in email messages that shouldn't have been said. If the attorneys from those companies had the benefit of quickly conducting these searches at the beginning of the case, they could have planned their defenses accordingly. As they say, knowledge is power; knowing who did what—and when—is critical to a defense team. More importantly, by

locating the critical documents very early in the proceeding, they have a chance to review and analyze potentially revealing information in advance. Meta data searches can save a lot of headaches down the road.

TOP: It makes sense when you think about it that way. You also mentioned new tools for searching documents for parent-child relationships. How does that work?

SN: This feature provides the ability to narrow "family group" searches to locate only the "children" or "parents" in email and attachment relationships. This enables users to quickly sort through groups of email messages separate from the attachments. Conversely, users can opt to locate all documents contained within a family group as part of a single document search set. For example, a search for the word "performance" could return the whole family of documents related to that word—not just email messages that included the word "performance," but also any documents attached to the messages.

TOP: And what is the practical benefit to clients here?

SN: Here's an example. Many of our clients prefer to review document family groups as a single document. The new family group search functionality will return all documents in a family group, providing at least one document meets the search criteria. This allows the reviewer to quickly consider all the documents in the family group, including those that did not specifically contain the

search criteria, when deciding how to classify a document. This can be very important when making decisions about how to categorize a particular set of documents for privilege, responsiveness, etc.

TOP: How are clients responding to these changes in Applied Discovery's search functionality?

SN: The response has been very gratifying—clients really appreciate the time it saves them in the review process. Recently, there has been some confusion about so-called natural language search engines that claim to have a "human-like" ability to understand written context. These engines claim to be able to respond to fuzzy, abstract search criteria. While this sounds great on paper, our clients have stressed that they would rather pinpoint the critical documents in the case than expand the universe of potentially relevant documents with vague search criteria. Our state-of-the-art search functionality gives them virtually endless ways to mix and match search criteria to pinpoint exactly the documents that are important to their case.

TOP: Thanks for the information Scott. Who should our readers contact if they have any further questions or want to see a demonstration of the search functions you've described?

SN: They can contact me directly at scott.nagel@applieddiscovery.com. ■

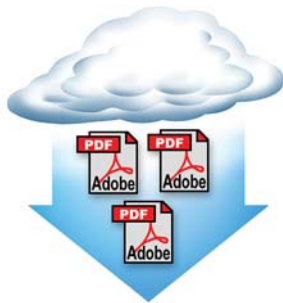
ELECTRONIC DOCUMENT PRODUCTION

Flexibility and Cost Control

Electronic data offers great flexibility and cost control in document production. Documents that originate in electronic format and are reviewed electronically can be produced in a number of ways. Any of these production formats can include Bates numbers, confidentiality markings or other document branding.



PDF files copied to disk



PDF files transmitted via an FTP site



PDF files or TIFF images exported for use with desktop litigation support systems



Printed copies of electronic documents

UPCOMING EVENTS

Applied Discovery will be participating in the following events this season. Please contact us to register to attend or to request more information.

**Glasser LegalWorks
6th Annual Electronic Discovery and Records
Management Conference**
Marriott Hotel, San Francisco
December 5, 2002

LegalTech New York
Hilton Hotel, New York City
Booths # 2105, 2107
January 27-29, 2003

West Central Florida ACCA Conference
St. Petersburg, FL
January 16, 2003

Western Pennsylvania ACCA Conference
Pittsburgh, PA
April 7, 2003

**BNA Litigation Forum
Electronic Discovery & Document Retention**
New York City
May 2003

**INSIDE :
TARGET CRITICAL
DOCUMENTS WITH
PRECISION!**

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APPLIED DISCOVERY IN THE NEWS

You may have seen or heard Applied Discovery recently in the following media appearances. Please contact us to request a copy of any these articles, or view them online at <http://www.applieddiscovery.com/newsevents/adiinthenews.asp>.

"Electronic Discovery Surpasses Paper Filings in M&A Regulatory Reviews"
Mergers & Acquisitions Magazine
November 2002

"Meta Data Matters"
Facts & Findings, The Journal of Legal Assistants
November 2002

Applied Discovery CEO Michael Weaver was featured on Bloomberg Radio
October 19, 2002

Applied Discovery CEO Michael Weaver was featured on Wall Street Journal Radio's "Wall Street Journal This Morning"
September 23, 2002

"Electronic Discovery: The E-volving Age of Document Production"
The Young Lawyer
American Bar Association
September 2002

