



Webinar: Mastering the Document Intensive Case

*A Blueprint for the Boutique Firm:
Leveraging eDiscovery Technology to Handle Large Document Sets with
Limited Staff*

- Webinars take place monthly and cover a variety of relevant eDiscovery topics
- If you have technical issues or questions, please email webinars@lexbe.com
- Lexbe webinars are available for viewing (streaming video), and downloadable as a PDF Presentation or an MP3 podcast.
- This Webinar and a complete listing of other onDemand webinars is part of the: [Lexbe eDiscovery Webinar Series](#)
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We are an Austin, TX based eDiscovery software and services provider, specializing in serving small & medium-sized law firms and organizations. We provide:

- *Cloud-based DIY eDiscovery processing & document review software*
- *High-speed ESI document processing and data conversion services*
- *Experienced eDiscovery specialists and expert consultants*

Gartner Customer Reviews

Lexbe eDiscovery Platform

by Lexbe



"Cost-effective eDiscovery"



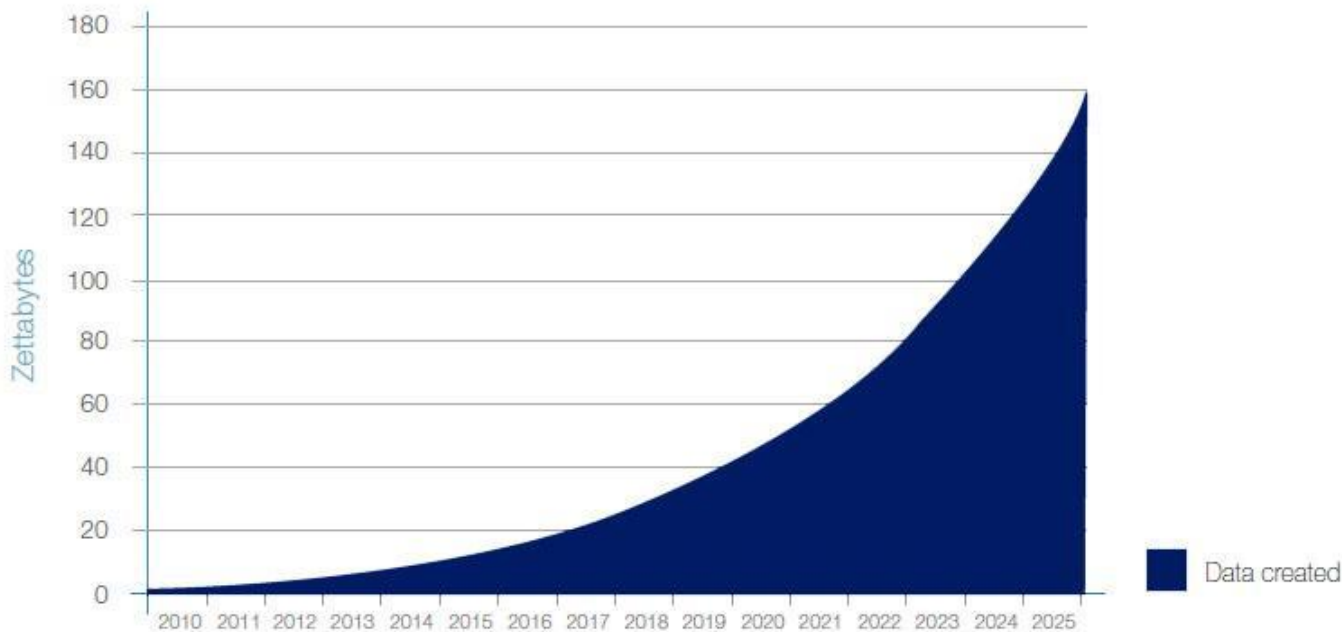
"Secure, easy-to-use and a great review tool for consideration"

TechnoLawyer®

"A powerful litigation document management service"

**eDiscovery
WebinarSeries**

Massive Growth of Electronically Stored Information



Source: IDC's Data Age 2025 study, sponsored by Seagate, April 2017

- CEO of Lexbe LC, a provider of cloud-based litigation processing, review and document management software & eDiscovery services
- Frequent speaker/author on eDiscovery and legal technology issues
- Planning Committee, Electronic Discovery Institute, State Bar of Texas
- eDiscovery consultant & expert
- Education
MBA, University of Texas
JD, Southern Methodist University
BA, University of Texas



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Mastering the Document Intensive Case

- Growth of Boutique Law Firms
- Growth in eDiscovery and the Challenges for Boutique Firms
- Technology to Support a Boutique Firm
- Boutique Firm eDiscovery Staffing - In-House vs. Outsourced
- Technology as an Enabler for Small Firms Handling Complex Cases
- eDiscovery/Document Management Software by Case Stage
- Summary/Takeaways

ABOVE THE LAW

BIGLAW, BOUTIQUE LAW FIRMS, PARTNER ISSUES, SMALL LAW FIRMS

A History-Making Litigator Leaves Biglaw To Launch A Boutique

After 25 years at a top Biglaw firm, this star litigator decided it was time for a new adventure.

A Legendary Litigator Jumps From Biglaw To Boutique

He's joining Berg & Androphy after more than forty years at Weil Gotshal.

Boutique Bests Biglaw In Booze-Bottle Battle

A jury trial, a celebrity client, and booze, lots of booze....

- Specializes in a niche area of law practice
- Relatively small
- Sophisticated practice area(s)

- Common litigation boutique practice areas
 - Class Action
 - Construction
 - Employment
 - Environmental
 - IP
 - Securities
 - Tax

- It's a lifestyle choice

Why Do Attorneys Leave Big Law for Boutique Law Practices?

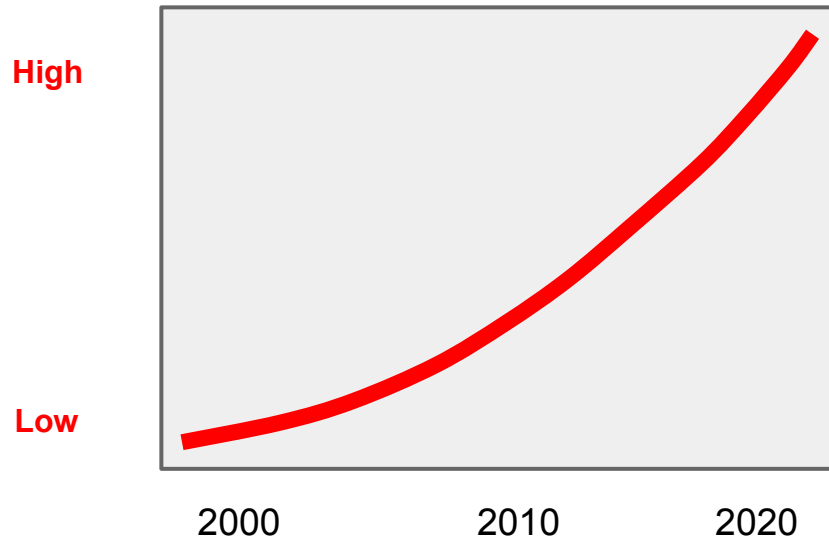
- Provide better service for clients
- Complete control of how cases are managed
- Ability to handle all desired aspects of a case
- Increased flexibility with one's time and work
- No constraints on building clientele
- Make more money

From Wallerstein, From Biglaw to Boutique - Top Ten Differences (Above the Law)

Boutique Firms Want to be 'Lean and Mean'

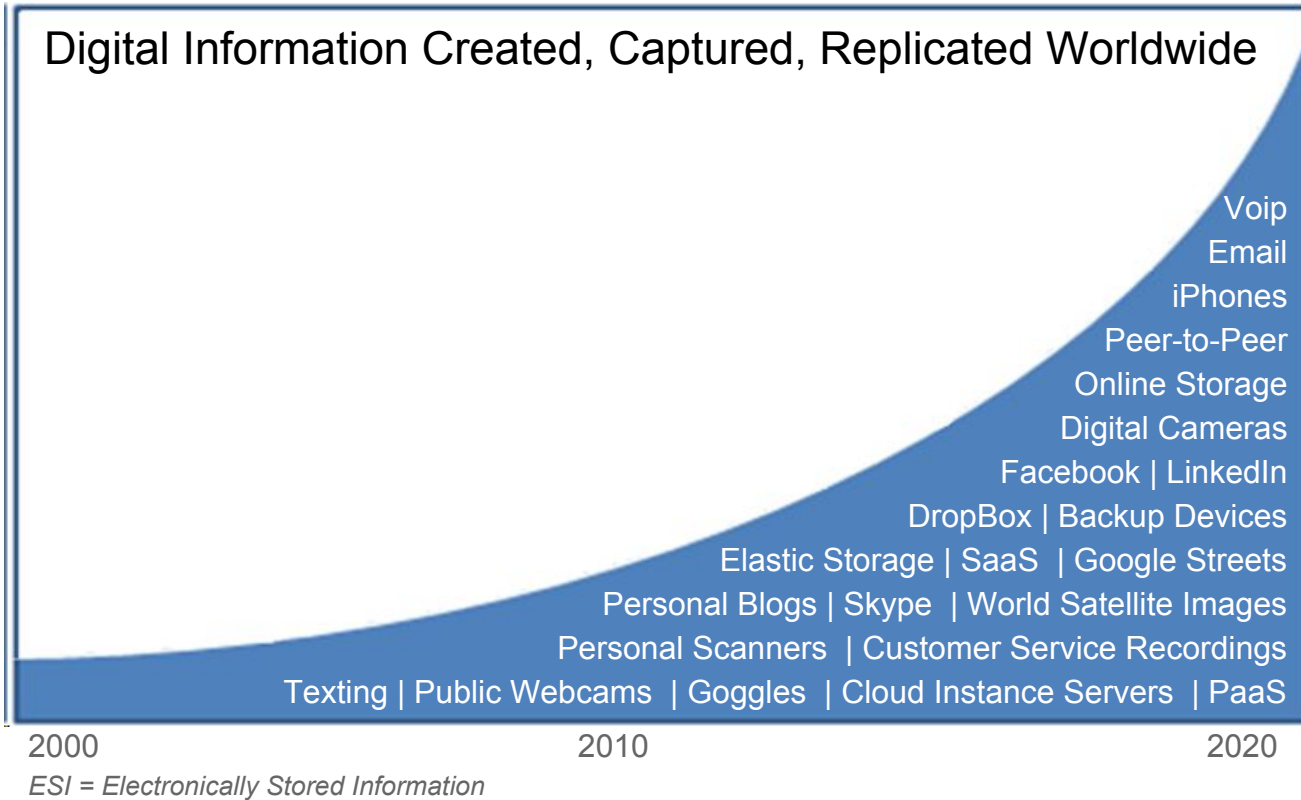
- **Infrastructure**
Lack of a large firm's expensive technology infrastructure
- **Support Staff**
Lack of in-house eDiscovery litigation support and IT staff
- **Computer Hardware & Software**
Lack of specialized litigation and eDiscovery hardware and software and related administrative expertise
- **Review Staff**
Lack of in-house associates and contract attorneys to staff a large case

GBs of ESI in a Typical Commercial Case



- Every two days we create as much information as we did from the dawn of civilization up until 2003
(Eric Schmidt, Google).
- Since 1997, ESI (electronically stored information) and data collections have grown exponentially, but the median months from complaint to federal commercial trial has increased only slightly--from 19 to 26 months.

Types of ESI Have Grown Exponentially



On-Demand Software is aka:

- Software as a Service (SaaS)
- Web-Based
- Cloud-Based
- ASP (older name)

Advantages

- Latest generation tools without capital and personnel investment
- Work from anywhere, collaborate and share data in real-time
- No up-front hardware or set-up costs
- No or limited internal ongoing IT staffing or maintenance costs
- Access to a scalable server structure for practically unlimited data processing, storage and speed
- Best practices in data encryption and security
- More easily passed as a cost to clients
- Possibly recoverable as damages in some action

Limitations of Keeping Excessive Internal Staff

- Expensive fixed cost whether there is sufficient work or not
- Management drain on partner time and attention
- Difficult or impossible to staff the range of ediscovery & specialized litigation support expertise needed in a small firm
- Internal non-paralegal time may be difficult to bill and recover

Advantages

- Staff can be increased quickly to meet variable staffing needs
- A full range of experts can be brought in
- Costs incurred more surgically, when needed for a case
- May be easier to get reimbursement

Limitations of On-Demand

- Need to maintain good eDiscovery vendor relations to match firm needs
- Need to communicate timing of expertise needed



- **Staying Competitive**
A practicing litigator was interviewed and noted that technology in general, and cloud computing in particular, helps a small law firm to stay competitive in today's constantly changing legal landscape.

- **Technology is the Great Equalizer**

“Technology is the great equalizer between smaller law firms and large firms. It puts you on a level field with law firms many times your size.”

- **Handle More Complex Cases Without Swamping Practice**

“I can now handle 2 or 3 complex construction litigation cases at one time and it doesn't take over my practice.”

<http://abovethelaw.com/2015/08/todays-tech-a-litigation-attorney-uses-technology-to-level-the-playing-field/>



- **Review More Documents Quickly**
I handle a lot of cases where upwards of 30,000 docs are produced. These documents used to fill the room. I can get through 30,000 documents quickly and narrow them down to what I really need to look at.
- **On-Demand Access to eDiscovery Software**
Now I buy access to Lexbe on a case-by-case basis.
- **Fewer Associates Needed on Staff**
So a process that used to require six associates days to read through the documents can now be accomplished in minutes.
- **Playing Field Levelled with Technology**
Because of the Lexbe software, the entire playing field has been leveled for my firm.
<http://abovethelaw.com/2015/08/todays-tech-a-litigation-attorney-uses-technology-to-level-the-playing-field/>



Goals

- Identify ESI custodians
- Map ESI data sources
- Determine collection methodology
- Collect ESI
- Quality control collection

eDiscovery Software Capabilities

- Custodian & ESI tracking/searching
- Data pivot analysis and reporting of collected data by custodian, location, file type, date, etc.
- Integrated reporting for drill-down analysis, as needed

ESI: *Electronically Stored Information*



Analysis | Research

Issues

- _Demo Enron Native 1
 - Causation
 - Executive Starts-Stops
 - Fraud on Market
 - Fraud with Anderson

Create New Issue

Research Topics

Create New Research

Delete Selected Research

Key Case Issues

Analysis | Case Participants

	Type	Name	Title	Memo	Role
<input type="checkbox"/>		Chewco Investments L. P.	Organization	Limited partnership associated with the...	Investment Partnership
<input type="checkbox"/>		Enron	Organization	American energy, commodities, and se...	Company
<input type="checkbox"/>		Fastow, Andrew	CFO	Enron CFO. Key person behind off bala...	Executive
<input type="checkbox"/>		Lay, Kenneth	CEO	Enron CEO and Chairman from 1985.	Executive
<input type="checkbox"/>		Meyers, Albert	Executive		Enron Executive
<input type="checkbox"/>		Skilling, Jeffrey	President, NA ...	Former CEO (2000)	Executive

Custodians

Role



ESI Content Map

Repository Name	<input type="text" value="Main Office Exchange Server"/>	ID	<input type="text" value="IIEN-036"/>
Repository Type	<input type="text" value="Email"/>	Location	<input type="text" value="Main Office"/>
Content Description			
<input type="text" value="Exchange email server. MS Exchange 2007. Appr. 20 GB of email on server (more in local PST files on client CPUs)."/>			
Governance Policies			
<input type="text" value="Users generally limited to 200MB on server, but exceptions allowed on case-by-case basis. Local PSTs allowed."/>			
Backup Policy			
<input type="text" value="Daily full backup, with tapes retained for 30 days. Monthly backup tape retained for 6 month."/>			
Business Owner	<input type="text" value="Bill Henderson"/>	Custodians	
IT Primary	<input type="text" value="James Robertson"/>	Custodians	
When Setup	<input type="text" value="2005"/>	Amount of ESI	
When Discontinued	<input type="text" value="N/A"/>	Amount of ESI	
Size (GB)	<input type="text" value="21.00"/>	Amount of ESI	
Not Reasonably Accessible	<input type="checkbox"/>	Accessible	
Record Last Updated	<input type="text"/>	Accessible	
Last Updated By	<input type="text"/>	Accessible	

Record: 23 of 57

Backup Policy

Custodians

Amount of ESI

Accessible

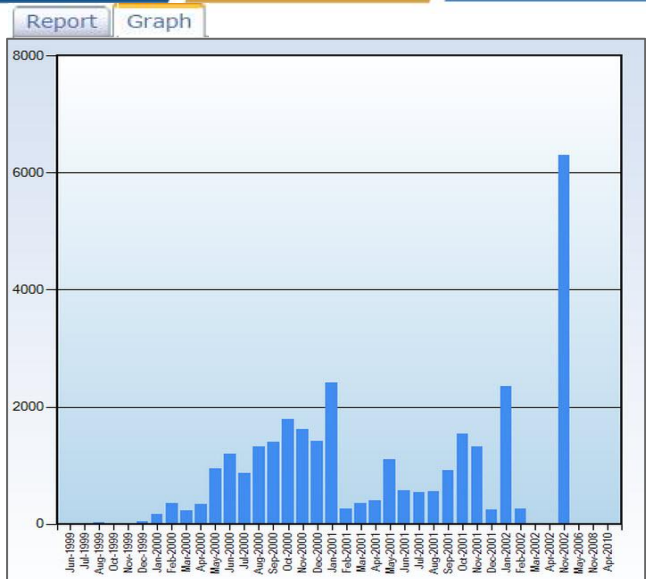


Goals

- Quickly, inexpensively and defensibly reduce ESI to potentially relevant documents.
- Cull ESI by date, custodian, metadata and keywords.
- Use ECA to analyze data to identify collection gaps.

eDiscovery Software Capabilities

- Expansion, extension repair, deNIST, deduplication, metadata extraction and fielding.
- Dynamic culling/filtering by Custodian, Date, Document Type, and other metadata fields.
- ECA reporting, pivot tables & graphing of ECA collected by custodian, date range, document type, etc.



FILE	HOME	INSERT
	A	B
1	Date	Doc Count
2	Jun-1999	1
3	Jul-1999	2
4	Aug-1999	19
5	Oct-1999	13
6	Nov-1999	4
7	Dec-1999	39
8	Jan-2000	158
9	Feb-2000	354
10	Mar-2000	227
11	Apr-2000	343
12	May-2000	950
13	Jun-2000	1201
14	Jul-2000	875
15	Aug-2000	1325
16	Sep-2000	1402
17	Oct-2000	1782
18	Nov-2000	1615
19	Dec-2000	1416
20	Jan-2001	2415
21	Feb-2001	261
22	Mar-2001	350
23	Apr-2001	407
24	May-2001	1110
25	Jun-2001	572
26	Jul-2001	537
27	Aug-2001	550
28	Sep-2001	916

- Track incoming ESI using pivot charts and visual graphs.
- Export Early Case Analysis data for further analysis and reporting.



Goals

- Accurately and quickly process ESI collected to prepare for review and production
- Extract text from natives and OCR images for optimal searchability
- Organize data for optimal review process

eDiscovery Software Capabilities

- Support common Native file types
- Searchable PDF, Image or HTML created for best document viewer experience
- Multi-server scalability for fast load, processing and index for review



Batch Title:	<input type="text" value="2014-09-18 Upload Batch"/>
Batch Comments (optional):	<input type="text"/>
Doc Source:	<input type="text" value="2014-09-15 Doc Source"/>
Case Participant:	<input type="text" value="Unassigned"/>
Time zone offset for MSG files:	<input type="text" value="Universal Time (0)"/>
Perform OCR on PDFs:	<input checked="" type="checkbox"/> Perform OCR on PDFs

- Assign custodian/case participants and automatically perform optical character recognition (OCR) on all incoming documents.

- Securely upload and process native documents directly from your browser.

File name	Size	Progress	
Native-1f225b81-518c-4d23-9bd2-725d57bbddeb.xls	158 KB	<input type="text" value="0%"/>	
Native-71f2dad6-2235-4c27-ab2a-b136131bb3f2 (1).	45 KB	<input type="text" value="0%"/>	
Native-babceda-cecf-439e-a3f3-5d3b800743aa (1).	695 KB	<input type="text" value="0%"/>	

Drag and Drop files here

- **Native Files**

Outlook Email (PST, MSG), Office files (Word, Excel PowerPoint), Web (HTML), Images (JPG, PNG, TIF) and most other common native files support. Container file (e.g., PST, ZIP, RAR) & email (MSG) attachment expansion.

- **Conversion to PDF for Review; OCR**

Supported file types automatically converted to PDF (or Image or HTML in some systems) for review and OCR'd. Native versions linked & reviewable.

- **Extraction and Fielding of Metadata**

Email: Sender, receivers, date, time & subject; Other files: Author, date last modified, and other metadata extracted and fielded in litigation database.

- **Indexing for Fast Search**

Search index optimized for fast retrieval.

- **Differing Forms of Production**
Productions may be in the form of single page TIFF images with load files, PDFs, and/or native files.
- **Load Files**
Load files contain document breaks for TIFF productions, metadata and other necessary or helpful file information. Common industry load files include DAT, DII and XLSX.
- **TIFF Productions are Large**
The older TIFF loadfiles required by legacy review platforms are very large, sometimes 8-10 times larger than native or text-based PDF productions.
- **OCR Quality can be Mixed**
Some productions have marginal or poor OCR. A review platform may be able to re-OCR for improved search.
- **Fast Load and Indexing is Key**
Productions may come in with little time before depositions.

Planning &
Collection

Culling &
ECA

Processing

Review

Production

Depos &
Motions

Trial &
Appeal

Goals

- Code documents accurately, quickly & cost effectively
- Identify responsive, privileged & attorney's eyes only (AEO) ESI
- Search, ID, & issue code key documents
- Multiple review methodologies available

AEO Attorneys' Eyes Only

TAR Technology Assisted Review

eDiscovery Software Capabilities

- Fast, accurate search
- Custom fields and coding capability
- Dynamic release review sets for reviewer load-balancing and quality control
- Near duplicate groupings for batched review, review quality
- TAR (predictive coding) capability as needed

Planning &
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| Search

Search

Lay AND Chewco

Search

Hearing Enron

Total Hits: 85

r rate us down, we don't do business with you." You got a call from a CEO of Enron. Who was Mr. Lay. Chairman TAUZIN. Mr. Lay called you. Mr. OLSON. Yes. I had called him. Chairman deal with our friends," right? Mr. OLSON. Yes. Chairman TAUZIN. And then he went through a

rn to you quickly. First of all, Mr. Bauer, let me make sure I understand what you are saying. ight down the house of cards, the Chewco deal, did not meet accounting standards as you use of a side agreement you were not shown; is that correct? Mr. B AUER. Congressman, I

Full Text View

you had the only paper, how you are talking to Mr. Lay, to meet the accounting
ever talk to Mr. <Lay> about your concerns about these financia
ters?

Mr. M CMAHON. No. The matters I spoke with Mr. Skilling ab
and Mr. Sutton about were with those two.

Ms. DEGETTE. Okay. Now, did you ever prepare an analysis of
<Chewco>'s distributions purchase interest in JEDI on behalf o

Planning &
CollectionCulling &
ECA

Processing

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Appeal

Hits Original Html Page Pdf Text Redacted Annotated

Full Document View

From: manfred@bellatlantic.net
Sent: Thursday, May 10, 2001 1:31:00 PM
To:
Cc: jeff.skilling@enron.comjeff.skilling@enron.com
Bcc: jeff.skilling@enron.comjeff.skilling@enron.com
Subject: FW: Business Development Opportunity

-----Original Message-----
From: John Manfredonia [mailto:manfred@bellatlantic.net]
Sent: Thursday, May 10, 2001 1:29 PM
To: Kenneth.Lay@enron.com
Cc: Jeffrey.Skilling@enron.com
Subject: Business Development Opportunity

Mr. Kenneth Lay

- **Hits** - Highlighted from search
- **Original** - Native if available
- **HTML** - Extracted text from native
- **Page** - One page at a time
- **PDF** - Full viewing & access
- **Text** - OCR of images
- **Produced** - Versions Bates-stamped
- **Redacted** - Confidentiality
- **Translated** - For foreign language
- **Annotated** - For depositions

Planning &
Collection

Culling &
ECA

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Appeal

- **Portable** - No need for additional local software to view files. Viewing in native alone can slow reviewers. Easily printed for depositions, etc.
- **Small** - A properly created text-based PDF is compact (same size as native original usually) and does not bloat the review platform.
- **Bates Stamping** - Documents can be bates stamped and pages specifically identified using a variety of software tools.
- **Easy to Work With** Single file (compared with single page TIFFs with separate text files, load files).
- **Native Integration** - Native files linked to record for access when needed; TIFFs can be created as part of production step.



[Save & Next Doc](#) [Save](#)

Discovery

Responsive:

- Attorney-Client Privilege
- Attorney Work Product
- Confidential
 - Custom Designation
- Document Reviewed By Others
- Document Reviewed By Me
- Is Key Document

Off-Balance Sheet Pships

- Chewco
- JEDI
- Raptor I
- Raptor II
- Raptor III

Damages

- Lost Profits
- Fraud on Market
- Opportunity Cost

Assigned Reviewer

- Jones, Bob
- Meyers, Mary
- Winston, Miles

Built-In Fields

- Immediately usable
- Integrated workflow
- Leverage best practices
- Wheel 'already invented'

Custom Fields

- Issue coding
- Reviewer assignment
- Add'l filtering/sorting
- Unlimited in number/use

Best to have both options

Review - Fast Multi-Doc Coding & Tagging



All 6,491 documents in list have been selected. [Clear Selection](#)

	Title	Damages	Lost Profits	Fraud on Market	Opportunity Cost
<input checked="" type="checkbox"/>	2000-11-29 03:16:00PM - Enron Top Line ...				
<input checked="" type="checkbox"/>	2000-10-02 04:24:00PM - Transactions in ...				
<input checked="" type="checkbox"/>	2000-09-21 09:02:00PM - 49 Days Left till ...				
<input checked="" type="checkbox"/>	1999-10-13 01:06:00PM - Kyoto Protocol P...				

Lost Profits

Edit

Edit: Lost Profits

Note: Update Documents action might affect numerous documents and cannot be undone.

All 6,491 documents in list have been selected. [Clear Selection](#)

	Title	Damages	Lost Profits	Fraud on Market	Opportunity Cost
<input checked="" type="checkbox"/>	2000-11-29 03:16:00PM - Enron Top Line ...		✓		
<input checked="" type="checkbox"/>	2000-10-02 04:24:00PM - Transactions in ...		✓		
<input checked="" type="checkbox"/>	2000-09-21 09:02:00PM - 49 Days Left till ...		✓		
<input checked="" type="checkbox"/>	1999-10-13 01:06:00PM - Kyoto Protocol P...		✓		



Account | Manage Review Sets

Review Set 09-18-2014

Title	Review Set 09-18-2014
Status	Reviewing
Remaining Docs	25
Reviewing	0
Reviewed Docs	25
Total Docs	50

[Edit](#)

Review Batch

Get Batch

Batch Done

- Dynamically create, assign, and release review sets.
- Maximize reviewer efficiency and eliminate dependencies.

Review Sets

--- Add Docs to Review Set ---

--- Remove Docs from Review Set ---

<input checked="" type="checkbox"/>	1980-01-01 02:00:00AM - Shankmar
<input checked="" type="checkbox"/>	1980-01-01 02:00:00AM - Tawney -
<input checked="" type="checkbox"/>	1980-01-01 12:00:00AM - Approval
<input checked="" type="checkbox"/>	1980-01-01 12:00:00AM - Backgrou



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- **Match Methodology and Case**

Case size/type/budget will drive which review method is preferable in any given case.

- **Linear Review**

Read, review, and code all documents, one at a time. Managed Review companies maintain contract attorneys to handle review of large document reviews.

- **Keyword Search**

Using search keywords to identify responsive and privileged documents. Sometimes maligned, it can be as accurate as any technology with proper use and testing.

- **Technology Assisted Review (TAR)**

Manually review a seed set of documents to train predictive coding algorithm that will automatically code the remaining documents. Generate and review control sets to evaluate the results.



- Apply near duplicate detection to identify inconsistent coding and prevent the inadvertent disclosure of privileged case information.

| Case | Add Case Documents

Near Duplication ⬆

Calculate Groups

Total Documents: 32,341

Title			Responsive	Privilege	Work Product	Confidential	Group
2000-09-26 11:59:00AM - EXECUTIVE COMMITTEE ...				✓		✓	29
2000-09-25 01:53:00PM - Update - Executive Commit...				✓		✓	29
2001-05-09 11:33:00AM - re: Executive Committee M...							29
2000-10-17 03:11:00PM - Management Conference tr...				✓		✓	29
2001-06-22 05:01:44PM - FW: Regal Ranch Info				✓		✓	29
2001-09-19 07:13:05PM - Enron Corp. Board of Direct...				✓		✓	29
2000-10-31 08:28:00AM - EXECUTIVE COMMITTEE ...				✓		✓	29
2000-12-11 10:20:00AM - No Executive Committee m...				✓		✓	29

Planning &
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Total Documents: 17				
	Title	From	To	Subject
<input type="checkbox"/>	2000-12-13 01:53:00PM - Re: Succession Plan	David Haug	Kenneth Lay{Kenneth.La...	Re: Succes
<input type="checkbox"/>	2000-12-13 02:38:00PM - Re: Succession Plan	rosalee.fleming@...	david.haug@enron.com{...	Re: Succes
<input type="checkbox"/>	2000-12-13 03:49:00PM - Succession Plan	curly.baca@enro...	kenneth.lay@enron.com{...	Succession
<input type="checkbox"/>	2000-12-13 04:14:00PM - Re: Succession Plan	David Haug	Kenneth Lay{Kenneth Lay}	Re: Succes
<input type="checkbox"/>	2000-12-13 04:38:00PM - Re: Succession Plan	Rosalee Fleming	David Haug{David Haug}	Re: Succes
<input type="checkbox"/>	2000-12-13 06:14:00AM - Succession Plan	richard.leibert@e...	jeff.skilling@enron.com{fj...	Succession
<input type="checkbox"/>	2000-12-13 06:21:00PM - Succession Plan	terrie.james@enr...	jeff.skilling@enron.com{fj...	Succession
<input type="checkbox"/>	2000-12-13 08:07:00AM - Succession Plan	rex.shelby@enro...	kenneth.lay@enron.com{...	Succession
<input type="checkbox"/>	2000-12-13 08:11:00AM - Succession Plan	rex.shelby@enro...	jeff.skilling@enron.com{fj...	Succession
<input type="checkbox"/>	2000-12-13 08:20:00AM - Re: Succession Plan	jeffrey.mcmahon...	kenneth.lay@enron.com{...	Re: Succes
<input type="checkbox"/>	2000-12-13 08:20:00AM - Succession Plan	tony.goncalves@...	jeff.skilling@enron.com{fj...	Succession
<input type="checkbox"/>	2000-12-13 08:58:00AM - Succession Plan	eric.pitcher@enro...	jeff.skilling@enron.com{fj...	Succession
<input type="checkbox"/>	2000-12-13 10:07:00AM - Succession Plan	Rex Shelby	Kenneth Lay{Kenneth Lay}	Succession
<input type="checkbox"/>	2000-12-13 10:20:00AM - Re: Succession Plan	Jeffrey McMahon	Ken Lay@ENRON{Ken La...	Re: Succes
<input type="checkbox"/>	2000-12-13 10:27:00AM - Succession Plan	richard.amable@...	jeff.skilling@enron.com{fj...	Succession
<input type="checkbox"/>	2000-12-13 11:53:00AM - Re: Succession Plan	david.haug@enro...	kenneth.lay@enron.com{...	Re: Succes

- Near duplicate detection can also enable email threading for streamlined review of electronic conversations.
- Reviewing email without proper threading can be cumbersome.



Goals

- Fast production to maximize review time.
- Flexible production options, including all industry standards.
- Safeguards against inadvertent production of privileged documents.

eDiscovery Software Capabilities

- Fast production throughput rate with scalable backend architecture.
- Blended production options (Native, PDF & TIFF).
- Loadfiles for all popular review platforms: DAT (Concordance, Ringtail, Relativity), DII (Summation), XLSX (Lexbe).
- Integrated QC.



Production 09-18-2014	
Title	Production 09-18-2014
Comments	
Created By	svandusen@lexbe.com
Run By	N/A
Bates Prefix	
Bates Base	1
Number Of Digits	7
Custom Designation	1234
Bates Stamp Pages	<input checked="" type="checkbox"/>
Control Number Stamp Pages	<input type="checkbox"/>
Production Type	Standard Plus TIFF
Docs Produced	0
Privilege or Work Product	0
Total Docs	0
Docs Size Produced	N/A
Docs Size Withheld	N/A
Docs Size Total	N/A
Produced Range	N/A
Withheld Range	N/A

Discovery Production Validation			
1. Responsive	2. Privilege	3. Work Product	4. Validated
Total Inconsistent Documents: 0			
Responsive tag passed validation.			
<input type="button" value="Expand Responsive"/>		Production Not Validated	<input type="button" value="Next"/>

Run Production Job	
<input type="checkbox"/> Send Notification	<input type="checkbox"/> Send Notification Upon Completion
<input type="button" value="Run"/>	<input type="button" value="Cancel"/>



Privilege Log Auto-Creation

- Metadata extracted from natives
- Email date/time, sender, receiver, subject
- Privilege and Work Product coding used
- Privilege log automatically generated for review

```

From: Johnson Adam
Sent: Thursday, May 31, 2001 4:59:19 PM
To: Bridges Michael{Michael.Bridges@ENRON.com}; Denny Jennifer{Jennifer.DeBoisblanc.Denny@ENRON.com}
Subject: Dynegy-ICE VOL May30
Attachments: #1.dat; DYNEGY-ICE VOL May30.xls
    
```

General Coding

Date: 2001-05-31 04:59:19PM

Date Sent: 2001-05-31 04:59:19PM

Date Received: 2001-05-31 04:59:19PM

Doc Source: 2013-06-13

From: Johnson Adam

To: Michael Bridges, Jennifer Denny

Cc:

Bcc:

Subject: Dynegy-ICE VOL May30

Discovery | Privilege Log

Doc	Bates	Doc Date	From	To	Subject Matter
Link	ENR 0000001	2001-05-31 04:59:19PM	Johnson Adam	Bridges Michael{Michael.Bridges@ENRON.com}; Denny Jennifer{Jennifer.DeBoisblanc.Denny@ENRON.com}	Dynegy-ICE VOL May30



Goals

- Organize key case issues and facts by linking to supporting case documents.
- Workflow tools to support deposition preparation.
- Workflow tools to support motion practice.

eDiscovery Software Capabilities

- Dynamic fact & issue timelining.
- Reports by Deponent, date range, issue.
- Transcript, key document highlighting and annotation.
- Reports for motion preparation.



Facts	
Title	Docs
Mr. Lay becomes client of NationsBank	Ken Lay Transcript Trial Transcript Transcript US vs. Lay 5-18-2006
Jeff Skilling, who has been a consultant for McKinsey & Co., joins Enron.	0000 AAA Dynege-ICE VOL May30 .. 15282375-skilling-supreme-ct-cert-petition1 Accounting-Scandal-Enron enron-240
Q. It looks like in December of '98 that you borrowed \$800,000 from th...	Transcript US vs. Lay 5-18-2006 (p.109)
The magical word of the day is "Burn Baby Burn."	enron-203 (p.1)
Trading starts	Enron the Scandal enron-227 (p.3)

Case Participants	8/1/1990	TimeLine	12/1/2001
Enron Skilling, Jeffrey	-		
Lay, Kenneth		-	
Albert Meyers Lay, Kenneth			-
Lay, Kenneth			-
Enron			-
Lay, Kenneth			-

Planning &
Collection

Culling &
ECA

Processing

Review

Production

Depos &
Motions

Trial &
Appeal

Full Document View

051806 us v lay bench v1

18 Q Okay. And do you recall when Mr. Lay became a client of
19 NationsBank?

20 A It would have been around about the summer of 1993.

21 Q Shortly thereafter, did you have a meeting with Mr. Lay?

22 A I did.

23 Q And what was the purpose of that meeting?

24 A The purpose of that meeting was to go over a line of credit
25 that he had requested to be secured by Enron stock.

0017

1 Q And so did you meet with him?

2 A I did.

3 Q Can you describe what was discussed at that meeting.

4 A We just discussed the purpose of the loan, the collateral
5 that we would be taking, and also what his future plans were in
6 terms of a relationship with the bank.

7 Q All right. And did you inquire about the -- Mr. Lay's
8 intentions for the use of the loan?

9 A Yes.

10 Q And why did you do that?

11 A Because when we -- when we extend a loan to a borrower
12 secured by stock, there is a question as to how much we can
13 actually advance against the value of the stock based on the

Doc Disc Notes Facts

New Fact

Fact

Order Facts By: Start Date Page

Add Doc To Existing Fact:

--- Select Fact ---

Not contested [Edit](#) [Delete](#)

Start: 01/01/93 End: 12/31/93 [Remove](#)

Mr. Lay becomes client of NationsBank

Not contested [Edit](#) [Delete](#)

Start: 01/01/95 End: 12/31/96 [Remove](#)

Family investment partnerships established in
1995-96 time frame. ENRONPROD1 0005690 (p.
102) [Link](#)

Not contested [Edit](#) [Delete](#)

Start: 12/01/98 End: 12/31/98 [Remove](#)

Q. It looks like in December of '98 that you



Find & Filter Facts & Issues to Quickly Prepare for Motion Practice

Filters

Fact:
 Enron files for bankruptcy ▾

Contested:
 Prospective ▾

Material Facts:
 Yes ▾

Document:
 Accounting-Scandal-Enron ▾

Case Participant:
 Albert Meyers ▾

Total Facts: 2					
Title	Docs	Case Participants	6/15/1993	TimeLine	11/4/2000
Mr. Lay becomes client of NationsBank	Ken Lay Transcript Trial Transcript (p.0)	Albert Meyers	████████████████████		
	Transcript US vs. Lay 5-18-2006 (p.0)	Lay, Kenneth			
Jeff Skilling is CEO (2000)	skilling-supplemental-brief-on-fastow-interview-notes (p.0)	Albert Meyers			████████████████████
		Lay, Kenneth Skilling, Jeffrey			



		Total Facts: 7			
Title		Contested	Material	Docs	
<input type="checkbox"/> Jeff Skilling, who has been a consultant for McKinsey & Co., joins Enron.		Yes, by us		15282375-skilling-supreme-ct-c Accounting-Scandal-Enron (p.0) enron-240 (p.0)	
<input type="checkbox"/> Family investment partnerships established in 1995-96 time frame.		No	Yes	Transcript US vs. Lay 5-18-2006	
<input type="checkbox"/> Q. It looks like in December of '98 that you borrowed \$800,000 from th...		No	Yes	Transcript US vs. Lay 5-18-2006	
<input type="checkbox"/> The magical word of the day is "Burn Baby Burn."			Yes	enron-203 (p.1)	
<input type="checkbox"/> Trading starts				Enron the Scandal (p.0) enron-227 (p.3)	



Goals

- Maintain access to case documents that may be brought up by opposing counsel.
- Allow rapid timeline updating for live case testimony.
- Maintain case data and documents throughout the trial and appeal process.

eDiscovery Software Capabilities

- Searchable document repository at trial.
- Timelines dynamically update with new testimony or other evidence added.
- Documents, facts & issues can be exported for Trial Director, Verdict and other presentation programs.
- Custodian/key case participant information retained for later conflict checking.

- **Boutique Law Firms are Ascending**

Boutique law firms are on the rise, handling larger and more complex cases than ever.

- **Lean & Mean**

To be 'Lean & Mean', a firm should have a robust technology and expert services strategy to expand firm capabilities.

- **eDiscovery Software a Must**

eDiscovery/Litigation Document Management Software is a must to handle modern document-intensive cases.

- **Technology Should Leverage Your Firm**

Technology should allow you to leverage your time, expertise and staff. It should be a practice multiplier to allow you to accept and manage more complex cases better.

- **On-Demand/Cloud/SaaS a Good Solution**

On-demand cloud or SaaS providers can be a good solution as it can offer you nearly limitless data hosting and processing capacity.

- **Match Your Specific Workflow Needs**

Match the need for your litigation workflow needs with the vendor/ provider's software and service models.

- **DIY Plus On-Demand Services as Needed**

Look for options that let you customize and control the process in a do-it-yourself way but still offer fast, expert assistance and services on-demand as needed.

- **Technology is the Great Equalizer**

Technology is the great equalizer between smaller law firms and large firms. It puts you on a level field with law firms many times your size.

The Lexbe Solution

Boutique Firms Want to be 'Lean and Mean'

- **Infrastructure**
Lack of a large firm's expensive technology infrastructure
- **Support Staff**
Lack of in-house eDiscovery litigation support and IT staff
- **Computer Hardware & Software**
Lack of specialized litigation and eDiscovery hardware and software and related administrative expertise
- **Review Staff**
Lack of in-house associates and contract attorneys to staff a large case

The Lexbe Solution

Boutique Firms Want to be 'Lean and Mean'

- **Infrastructure**

Lack of a large firm's expensive technology infrastructure

Lexbe operates within the Amazon Web Service (AWS) cloud environment and incorporates Amazon's Elastic Compute Cloud (EC2), Amazon Simple Storage Service (S3), and Elastic Block Store (EBS) technology.

- Scalable
- Secure



The Lexbe Solution

Boutique Firms Want to be 'Lean and Mean'

- **Computer Hardware & Software**

Lack of specialized litigation and eDiscovery hardware and software and related administrative expertise

- Because your files are stored in the cloud, litigation teams can access them from any internet-capable device. No costly in-house installation of servers and other hardware. No ongoing maintenance of those machines.

The Lexbe Solution

Boutique Firms Want to be 'Lean and Mean'

- **Support Staff**

Lack of in-house eDiscovery litigation support and IT staff

- Lexbe empowers firms without large litigation support departments to instantly increase their discovery and review capacities.
- Our 24 hour ticket system allows you to submit an IT issue to our support department.

The Lexbe Solution

Boutique Firms Want to be 'Lean and Mean'

- **Review Staff**

Lack of in-house associates and contract attorneys to staff a large case

- Lexbe technology can drastically increase the speed and quality of your review by automating critical review tasks, reducing the workload for your review staff
 - NearDun
 - Email Threading
 - Advanced Search with the Uber Index
- Lexbe has an expert eDiscovery Professional Services team that can step in to assist with any aspect of your eDiscovery needs
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 - Working with non-standard load files
 - Assisting with Rule 26(f) conference

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