

Really Big Company (RBC) Production Requirements

Submit all documents according to the instructions below. Some instructions require discussion with RBC counsel prior to production, which can be part of a general "Meet and Confer" between the parties or a separate discussion involving persons specifically familiar with your electronically stored information (ESI) systems and methods of retrieval.

Types of Files

1. Native or Near-Native Files
 - a. Whenever possible, produce responsive ESI in its native form; that is, in the form in which the information was customarily created, used and stored by the native application employed by the producing party in the ordinary course of business (i.e., .doc, .xls, .ppt, .pdf).
 - b. If production of an ESI item in its native form is infeasible, it may be produced in a near-native form (i.e., there is not a material loss of content, structure or functionality as compared to the native form) that the RBC agrees to prior to production.
 - c. Native files containing embedded files must have those files extracted, produced in their native form in accordance with #1.a., and have the parent/child relationship identified in the accompanying production metadata.
2. Databases
 - a. Microsoft Access databases may be produced in either .mdb or .accdb format.
 - b. Discuss all other database formats with the RBC prior to production.
3. Multimedia
 - a. Multimedia files (i.e., audio, video) may be produced in .mp3 or .mp4 formats.
 - b. Discuss production of multimedia (i.e., audio, video) in other file formats with the RBC prior to production.
4. Discuss production of instant messages, CRM, proprietary applications, and any other type of ESI not specifically referenced in #1, 2, or 3 with the RBC prior to production.
5. Hard Copy Documents
 - a. Scan in an electronic format documents stored in hard copy in the ordinary course of business.
 - b. Produce scanned documents as 300 DPI individual multi-page PDFs per document. For marketing materials and where necessary to interpret documents or render them intelligible, submit documents in color.

- c. Produce scanned documents with embedded searchable text.
 - d. Produce hard copy documents in the order in which they appear in your files and without being manipulated or otherwise rearranged.
 - e. Treat documents kept in folders or binders as family members. Scan the cover of a binder or folder separately and have it serve as the parent document. Scan each document within a folder or binder as an individual document and have it serve as a child to the parent folder or binder.
6. Redacted Documents
- a. Produce ESI requiring redaction in a near native searchable PDF format.
 - b. Produce redacted documents as individual multi-page PDFs per document.
 - c. Produce redacted documents with embedded searchable text.
 - d. If hard copy documents require redaction, follow all requirements laid out in #5.

De-duplication, Email Threading, and Passwords

7. De-duplication
- a. De-duplication based on MD5 or SHA-1 hash value may be conducted within a custodian's set of files without RBC approval so long as the RBC is notified of the intent to de-duplicate prior to production.
 - b. Discuss de-duplication of any other scope or means with the RBC prior to production.
8. Use of email threading software must be discussed with the RBC prior to production.
9. For password protected files, remove their passwords prior to production. If password removal is not possible, provide a cross reference file including original filename, production filename, and the respective password.

Production Metadata

10. Family Relationships: Regardless of form of production, preserve the parent/child relationship in all files as follows:
- a. Produce attachments as separate documents and number them consecutively to the parent file.
 - b. Complete the ParentID metadata field for each attachment.
11. Document Numbering and File Naming
- a. Each document must have a unique document identifier ("DOCID") consisting of a prefix and 7-digit number (e.g., ABC0000001) as follows:
 - i. The prefix of the filename must reflect a unique alphanumeric designation, not to exceed seven (7) characters identifying the producing party. This prefix must remain consistent across all productions.

- ii. The next seven (7) digits must be a unique, consecutive numeric value assigned to the item by the producing party. Pad this value with leading zeroes as needed to preserve its 7-digit length.
- iii. Do not use a space to separate the prefix from numbers.
- b. Name each native or near native file with its corresponding DOCID number and appropriate file extension (e.g., ABC0000001.doc).

12. Load File Format

- a. Produce metadata in a delimited text file (.DAT) for each item included in the production. The first line of the delimited text file must contain the field names. Each subsequent line must contain the metadata for each produced document.
- b. Use these delimiters in the delimited data load file:

Description	Symbol	ASCII Code
Field Separator	¶	020
Quote Character	”	254
New Line	®	174
Multiple Field Entries	;	059

13. The following chart describes the required metadata for native, scanned, and redacted documents. If you want to submit additional metadata, discuss with the RBC prior to production.

Production Metadata				
Field Name	Native	Scanned	Redacted	Format
DOCID	Y	Y	Y	Alphanumeric (see #11 above)
PARENTID	Y	Y	Y	Alphanumeric
NATIVELINK	Y	Y	Y	Alphanumeric
CUSTODIAN	Y	Y	Y	Alphanumeric
RESPSPEC	Y	Y	Y	Alphanumeric (question # record responds to)
ORIGFILENAME	Y		Y	Alphanumeric
ORIGPATH	Y		Y	Alphanumeric
CONFIDENTIAL	Y	Y	Y	Boolean – Y/N
HASH	Y	Y	Y	Alphanumeric
From			Y	Alphanumeric
To			Y	Alphanumeric
CC			Y	Alphanumeric
BCC			Y	Alphanumeric
EmailSubject			Y	Alphanumeric
DateSent			Y	MM/DD/YYYY HH:MM:SS AM/PM
DateRcvd			Y	MM/DD/YYYY HH:MM:SS AM/PM
Author			Y	Alphanumeric

Subject			Y	Alphanumeric
DateCreated			Y	MM/DD/YYYY HH:MM:SS AM/PM
DateLastMod			Y	MM/DD/YYYY HH:MM:SS AM/PM

Production Media

14. Prior to production, scan all media and data contained therein for viruses and confirm the media and data is virus free.
15. For productions smaller than 50GB, the RBC can accept electronic file transfer via RBC hosted secure file transfer protocol. Contact the RBC to request this option. The RBC cannot accept files via Dropbox, Google Drive, or other third-party file transfer sites.
16. Use the least amount of media necessary for productions. Acceptable media formats are optical discs (CD, DVD), flash drives, and hard drives. Format all media for use with Windows 7.
17. Data encryption tools may be employed to protect privileged or other personal or private information. Discuss encryption formats with the RBC prior to production. Provide encryption passwords in advance of delivery, under separate cover.
18. Mark the exterior of all packages containing electronic media sent through the U.S. Postal Service or other delivery services as follows:

**MAGNETIC MEDIA- DO NOT X-RAY
MAY BE OPENED FOR POSTAL INSPECTION.**
19. Provide a production transmittal letter with all productions which includes:
 - a. A unique production number (e.g., Volume 1).
 - b. Date of production.
 - c. The numeric range of documents included in the production.
 - d. The number of documents included in the production.