

## eDiscovery

Each of the attorneys in our firm's eDiscovery practice group has extensive experience advising and representing clients with regard to electronic discovery and document retention issues. Our eDiscovery practice group provides custom-tailored and cost-conscious electronic discovery consulting, advice and project management services for clients facing litigation across all of our firm's substantive practice areas. In addition to providing representation during complex civil litigation, our eDiscovery practice group also works with clients in the context of developing and maintaining company-wide document retention policies. In addition to working closely with attorneys in all practice areas across our firm, the attorneys in our eDiscovery practice group also assist with electronic discovery matters for clients where Cullen and Dykman is not the counsel of record.

### Comprehensive eDiscovery Representation, Consulting and Project Management for Complex Civil Litigation

Our eDiscovery practice group offers a comprehensive suite of services for clients and other law firms, relying on an in-depth understanding of complex electronic discovery our Firm's state-of-the-art technological resources. The attorneys in our eDiscovery practice group routinely provide services such as:

- Assisting clients in developing cost-effective policies for the appropriate retention, preservation, and destruction of electronic data to comply with emerging standards;
- Supervising and interfacing with third-party electronic discovery vendors;
- Ensuring that only required business and compliance records are retained and subject to potential discovery inquiries;
- Drafting and reviewing document retention policies to ensure that they contain adequate "litigation hold" provisions;
- Drafting and reviewing email retention and destruction policies;
- Developing litigation-readiness and litigation hold plans to ensure that clients are able to properly respond to electronic discovery requests, including drafting and assisting with the implementation of document hold policies and procedures, evaluation and selection of electronic discovery service providers, data mapping, and document collection protocols;
- Guiding and assisting clients with the identification, preservation, collection and processing of hardcopy documents and electronically-stored information (ESI);
- Conducting comprehensive electronic discovery meet-and-confer sessions with relevant personnel;
- Managing electronic discovery litigation practice and related activities, including preparing information technology (IT) personnel for depositions and motions practice;
- Overseeing the various production states of initial, quality control and privilege reviews;
- Responding to notices to depose company representatives regarding clients' IT infrastructures;
- Securing protective orders for sensitive data, such as trade secrets and other forms of proprietary

information; and

- Conducting in-house training on electronic discovery and document retention matters.

Our eDiscovery group is capable of efficiently serving clients in cases ranging from small matters involving less than one gigabyte of data (up to 50,000 pages) to large matters involving a terabyte or more of data (over a million pages). As a testament to their knowledge in this complex and constantly evolving area of the law, the attorneys in our eDiscovery practice group frequently give seminars and publish articles on emerging issues in electronic discovery.