

Project Planning

Iris considers the project planning phase to be the foundation of a successful project regardless of size and complexity. In the initial planning meeting, Iris gathers detailed information regarding the case, key players, collection and preservation strategies, discovery issues, and review methodologies. Iris' consultants and sales engineers mold a customized discovery execution plan that conforms to the needs of the legal team. Iris offers insights to ways of cost-effectively managing the discovery process, minimizing the risks associated with electronic data and leveraging techniques to give our clients a legal advantage. It all begins with the initial project planning meeting where the following is discussed.

Scope and Size

Defining the scope and size of a project is the first layer in the project planning process. The following questions are asked in order to define the scope and size of a project:

Collection and Preservation Information:

- ✔ How has the corporation dealt with the litigation hold to date?
- ✔ Is there a preservation order in place?
- ✔ Will Iris be required to perform a forensic collection?
 - Hard Drives
 - Network Servers
 - Removable Media such as thumb drives, external drives, etc.
- ✔ The number of Custodians
- ✔ Location of Custodian data
- ✔ Will Iris be required to locate and restore backup tapes?

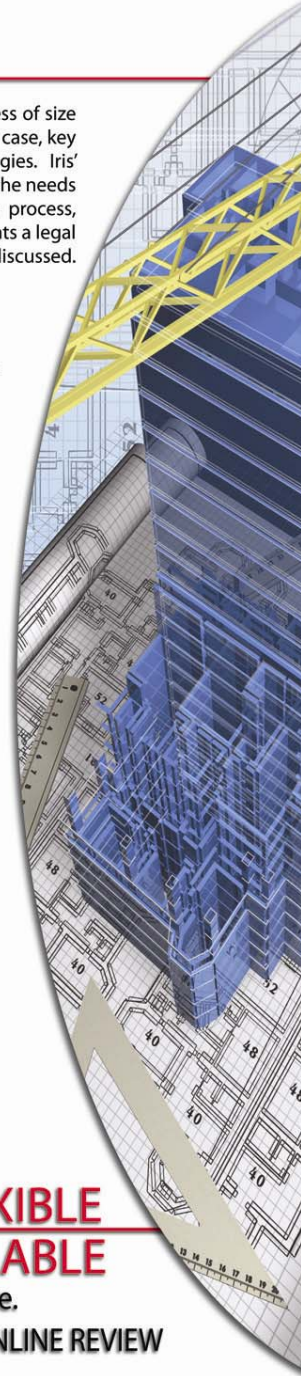
Document Information:

- ✔ Email and/or User Files Type Identification
 - MS Exchange/Outlook
 - Lotus Domino/Notes
 - Novell Groupwise
 - Linux OS
 - Windows OS
 - Foreign Language(s)
 - Macintosh Files
 - MS Access Databases
 - SQL or Oracle Databases
 - Mainframe Systems
 - Proprietary Systems
- ✔ Hard Copy Handling
 - Will scanning, OCR, and/or coding be required
 - If scanning is required, what is the name of the scanning Vendor?
 - If coding is required, a coding manual will need to be completed.



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Project Planning

Scope and Size

Processing:

- Initial Culling Options
 - By date
 - By keywords
 - Custodian filtering
 - File type filtering
- De-duplication Options
 - Horizontal (entire collection)
 - Vertical (per custodian)
- Processing Options
 - Native files only with metadata extraction
 - Native files and metadata extraction with TIFF images

Review:

- Hosting Options - Access
 - How many parties will require access to the system?
 - How many users will require access to the system?
 - How long will the system need to be online?
 - What user rights will be created for reviewers, case managers, and others?
- Hosting Options - Functionality
 - What metadata fields will be populated?
 - Are there any concepts that should be identified?
 - Are there any document review assignments that should be pre-loaded?
 - What database pre-highlights should be applied?
 - What pick-lists should be created?
 - What rules, if any, do you want set up for consistent coding?

Time Frame

Setting proper expectations between Iris and the client is crucial to project success. Iris will obtain the following information in order to accurately assess and provide timelines and associated milestones to its client:

- Date of length of collection
- Initial data delivery date to Iris
- Desired review start date
- Current production deadline

Statement of Work

Once a discovery execution plan is developed after meeting with the legal team and identifying the above information, Iris will draft a Statement of Work. The Statement of Work will contain requirements and time frames based on Iris' technology and capacity. When the data is received, Iris will amend the Statement of Work to include a description of the data received and make any adjustments necessary to the tasks. After execution of the Statement of Work, project coordination and processing will begin. The Statement of Work will also contain an estimate based upon the information received from the Client. Due to unexpected issues with the data or additional data received, Iris will update the Statement of Work with a Change Request for approval and sign off by the Client as necessary.



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