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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

In Re: KIA HYUNDAI VEHICLE
THEFT MARKETING, SALES
PRACTICES, AND PRODUCTS
LIABILITY LITIGATION

Case No.: 8:22-ML-3052 JVS(KESx)

**ORDER NO. 7: ESTABLISHING THE
PROTOCOL FOR THE
PRODUCTION OF DOCUMENTS
AND ELECTRONICALLY STORED
INFORMATION (“ESI”) AND
PRIVILEGE LOGS**

This document relates to:

ALL CASES

TABLE OF CONTENTS

	<u>Page</u>
1	
2	
3	I. PURPOSE..... 1
4	II. COOPERATION 1
5	III. DEFINITIONS 1
6	IV. SEARCH..... 2
7	
8	A. Search Methodology..... 2
9	V. PRIORITIZATION AND DISCLOSURES OF CUSTODIAL AND NON-
10	CUSTODIAL SOURCES..... 2
11	VI. PRODUCTION..... 3
12	A. Each Production Will Have Four Main Components 3
13	B. Production of Hard-Copy Documents..... 3
14	C. Production of Documents..... 4
15	D. Production of Databases and Other Structured Data 8
16	E. Production of Audio and Video Recordings 8
17	F. Production of Transcripts 8
18	G. Processing of Third-Party Documents 8
19	H. Miscellaneous Provisions..... 9
20	
21	VII. ASSERTIONS OF PRIVILEGE 11
22	A. Production of Privileged Documents. 11
23	B. Privilege Logs..... 11
24	C. Logging of Document Families..... 12
25	VIII. MODIFICATION 12
26	A. Modification by Agreement 12
27	B. Modification by Court Order..... 13
28	

1 Pursuant to the agreement reached between Plaintiffs and Defendants herein, this
2 Court adopts and orders the following Protocol relating to the Production of Documents
3 and Electronically Stored Information in these Proceedings. “Plaintiff(s)” shall mean
4 each Plaintiff in any case consolidated as part of or related to this MDL that has not been
5 dismissed from the MDL. “Defendants” shall mean Hyundai Motor America, Kia
6 America, Inc., and Hyundai America Technical Center, Inc. Plaintiffs and Defendants
7 are collectively referred to as the “Parties.” The failure of this Protocol to address any
8 issue is without prejudice to any position that a Party may take on that issue.

9 I. PURPOSE

10 This Stipulated Protocol for Producing Documents and ESI (the “ESI Protocol”)
11 will govern the Production of Documents by the Parties in the above-captioned litigation
12 and will serve as a supplement to the Federal Rules of Civil Procedure, this Court’s Local
13 Rules, and any other applicable orders and rules.

14 The ESI Protocol can govern productions made by any third party that is
15 subpoenaed in this Action. Accordingly, the ESI Protocol shall be attached to any
16 subpoena issued in this Action.

17 II. COOPERATION

18 The Parties are aware of the importance the Court places on cooperation and
19 commit to cooperate in good faith throughout the matter consistent with Federal Rules
20 of Civil Procedure and this Court’s Local Rules. Should any party subsequently
21 determine in good faith that it cannot proceed as required by this Order or that the Order
22 requires modification, the Parties will meet and confer to resolve any dispute before
23 seeking Court intervention.

24 III. DEFINITIONS

25 1. “Action” means this MDL, *In Re: Kia Hyundai Vehicle Theft Marketing,*
26 *Sales Practices, and Products Liability Litigation*, No. 8:22-ml-03052-JVS-KES.

27 2. “Documents” means documents, tangible things, and electronically stored
28 information, as defined by Federal Rule of Civil Procedure 34(a)(1)(A).

1 Each Party will meet and confer within 45 days of the later of entry of this ESI
2 Protocol or being served with a request for Documents regarding the appropriate number
3 of custodians and a date by which the Parties will exchange such a list of custodians.

4 The custodian information disclosure shall include job title or position, the entity
5 that employed the custodian, and the dates in which the custodian held each title.

6 VI. PRODUCTION

7 A. Each Production Will Have Four Main Components

- 8 1. A directory titled "images" containing images of every page of every
9 Document in the production, Bates-numbered sequentially, with each image
10 having searchable text (to the extent it contains text).
- 11 2. A directory titled "natives" containing Native Files for a subset of the
12 Documents, as described below, each file named with the Bates number of
13 the first page of the Document, and with the same extension as the original
14 Native File type of the Document.
- 15 3. A directory titled "text" containing OCR or Extracted Text files, one file per
16 Document, each file named with the Bates number of the first page of the
17 Document it represents with no additional text beyond this, followed by
18 ".txt" suffix.
- 19 4. A directory titled "data" containing image and metadata Load Files that
20 contain the Bates ranges and Metadata for each Document.

21 B. Production of Hard-Copy Documents

22 Documents maintained in a Party's ordinary course of business as Hard-Copy
23 Documents should be scanned in a manner so as to retain the original organization of the
24 Hard-Copy Documents. Hard-Copy Documents should be scanned as PDF images with
25 an .opt image cross-reference file and a delimited database load file (i.e., .dat). Hard-
26 Copy Documents should be physically unitized. Hard-Copy Documents shall be run
27 through optical character recognition ("OCR") software, and the full text shall be
28

1 provided on a document-level in an appropriately formatted text file (.txt) that is named
2 to match the first bates number of the document.

3 If the Producing Party reasonably believes that production of Hard-Copy
4 Documents is unduly burdensome, the Producing Party shall seek to meet and confer in
5 good faith with the Requesting Party regarding content, volume, and related issues before
6 any production of Hard-Copy Documents.

7 Paper Documents that contain fixed notes shall be scanned with the notes affixed,
8 if it can be done so in a manner so as not to obstruct other content on the document. If
9 the content of the document is obscured by the affixed notes, the document and notes
10 shall be scanned first as the document was stored in the ordinary course of business, and
11 then separately.

12 **C. Production of Documents**

13 The Parties agree to produce in the formats described below. If any Party contends
14 that Documents warrant a different format, the Parties will meet and confer to determine
15 a mutually acceptable production for such Documents.

- 16 **1. Image Format.** Multi-page searchable TIFFs shall be provided for each
17 document, with each TIFF named after the beginning production number of
18 that document. Bates numbers, confidentiality designations (in accordance
19 with the protective order governing the case), and redactions (to the extent
20 they are necessary) shall be burned into the. Image files shall be provided in
21 an “Images” folder.
- 22 **2. Extracted Text Files.** For native files containing embedded text, the full text
23 of native files shall be extracted directly from the native file (not OCR) and
24 shall be delivered in an appropriately formatted text file (.txt) that is named
25 to match the first bates number of the document. Text files shall be provided
26 in a “Text” folder. To the extent that a document is redacted, the document
27 shall undergo OCR after the text has been redacted to remove redacted text.
28

1 **3. Unique IDs.** Each document shall have a unique filename, which
2 corresponds to the first Bates number of the document. The filename shall
3 not contain any blank spaces and shall be consistently zero-padded (*e.g.*,
4 ABC-0000001), taking into consideration the estimated number of pages to
5 be produced. If a Bates number or set of Bates numbers is skipped in a
6 production, the Producing Party will so note in a cover letter or production
7 log accompanying the production. Bates numbers will be unique across the
8 entire production and prefixes will be consistent across all Documents a
9 Party produces in the litigation.

10 **4. Parent-Child Relationship.** The relationship between attachments,
11 enclosures, embedded files, and/or exhibits to any parent document shall be
12 preserved. Absent a claim of privilege, the child-document shall be
13 consecutively produced immediately after the parent-document. Each
14 document shall be produced with the production number for the first and last
15 page of that document in the “Begin Bates” and “End Bates” fields of the
16 data load file and with the “BeginFamily” and “EndFamily” fields listing the
17 production number for the first and last page in the document family. A
18 document and all other Documents in its attachment range, e-mails with
19 attachments, and files with extracted embedded OLE Documents all
20 constitute family groups.

21 **5. Native Format.**

22 a) All Documents produced in native format shall include the relative file path
23 of the native files in the document production in the “NativePath” metadata
24 field. All native files produced in lieu of images shall be produced in the
25 manner set forth below in subsection (g).

26 b) Spreadsheets (.XLS, .XLSM, or similar file formats) shall be produced in
27 native format, with the exception that any spreadsheet that requires redaction
28

1 may be produced as a TIFF image provided that the unredacted information
2 is viewable.

3 c) Presentation files (.PPT or similar file formats) shall be provided in native
4 format, with the exception that any presentation file that require redaction
5 may be produced as a TIFF image provided that the unredacted information
6 is viewable. The corresponding load file shall include native file link
7 information for each native file that is produced.

8 e) Documents containing tracked changes, comments, or hidden text or content
9 must be processed to show readily available tracked changes, comments, or
10 hidden text or content, or alternatively such content must be viewable in
11 native file.

12 f) Where native files are produced in lieu of images, each native file will be
13 assigned a unique Bates number. The Producing Party will produce a
14 placeholder (a single-page slip sheet indicating that the native item was
15 produced) along with the file itself in native format. The placeholder will be
16 branded with the production number in the lower right-hand corner and the
17 phrase "PRODUCED IN NATIVE FORMAT" branded in the center of the
18 page. The Producing Party will also brand any confidentiality or similar
19 endorsements in the lower left-hand corner of the placeholder.

20 g) Request for Native Files. Other than as specifically set forth above, a
21 Producing Party need not produce Documents in native format. If good cause
22 exists for the Requesting Party to request production of certain Documents
23 in native format, the Requesting Party may request production in native
24 format by providing (1) a list of the Bates numbers of Documents it requests
25 to be produced in native format or the category of Documents it requests to
26 be produced in native format; and (2) an explanation of the need for
27 reviewing such Documents in native format. The Parties shall meet and
28 confer about such requests. For any request that is denied, the Producing

1 Party shall provide an explanation for the reason or reasons for denying such
2 request. The Producing Party shall produce an overlay to ensure that the
3 “NativePath” entry in the data load file indicates the relative file path to each
4 Native File in such production, and all extracted text and applicable metadata
5 fields.

6 **6. Password Protected Files.** The Producing Party shall **produce** passwords
7 for any password-protected files or remove passwords and encryption from
8 files prior to production.

9 **7. Embedded Documents.** Embedded Documents (*e.g.*, a spreadsheet
10 embedded within a word processing document) will be extracted, produced
11 as independent document records, and related back to the respective top level
12 parent document (*e.g.*, standalone file, email message, etc.) via the
13 “BeginFamily” and “EndFamily” fields referenced in Appendix 1. Related
14 Documents will be produced within a continuous Bates range.

15 **8. Data Load Files.** Documents shall be provided with an Opticon image .OPT
16 load file and Concordance metadata .DAT load file using standard
17 Concordance delimiters:

- 18 a) Field Separator: ASCII character 20 (“**¶**”);
- 19 b) Quote: ASCII character 254 (“**þ**”); and
- 20 c) New Line: ASCII character 174 (“**®**”).

21 Concordance-compatible image and data load files shall be provided
22 in a “Data” folder.

23 **9. Metadata.** Appendix 1 sets forth the minimum metadata fields that must be
24 produced to the extent that metadata exists for a particular document. To the
25 extent that metadata does not exist, is not reasonably accessible or available,
26 or would be unduly burdensome to collect, nothing in this ESI Protocol shall
27 require any Party to extract, capture, collect, or produce such data.
28

1 **10. Deduplication.** Exact duplicate Documents may be deduplicated (based on
2 MD5 or SHA1 hash values) at the family-group level provided that the
3 Producing Party identifies the additional custodians in the “All Custodians”
4 field, and the file paths of all duplicates provided in the “All Paths” field.
5 Attachments shall not be eliminated as duplicates for purposes of production,
6 unless all Documents within a family, such as the parent e-mail and all
7 attachments, are also exact duplicates.

8 **D. Production of Databases and Other Structured Data**

9 If a database or other source of structured data contains responsive information,
10 the Producing Party shall alert the Requesting Party to its existence, and the Parties shall
11 meet and confer to determine how such data can be produced in a mutually agreeable
12 format for producing the database or other structured data.

13 **E. Production of Audio and Video Recordings**

14 If audio and/or video recordings are responsive and not subject to objections, the
15 Producing Party shall alert the Requesting Party to their existence, and the Parties shall
16 meet and confer to determine a mutually agreeable format for producing the audio and/or
17 video recording.

18 **F. Production of Transcripts**

19 If deposition or other transcripts are responsive and not subject to objections, the
20 Producing Party shall alert the Requesting Party to their existence, and the Parties shall
21 meet and confer to determine a mutually agreeable format for producing the transcripts.

22 **G. Processing of Third-Party Documents**

- 23 1. A Party that issues a non-party subpoena shall include a copy of this ESI
24 Protocol as an attachment to the subpoena and request that the non-party
25 produce Documents in accordance with the specifications set forth herein.
- 26 2. The Issuing Party may request that the non-party simultaneously produce
27 Documents to the Issuing Party and all other Parties. If the non-party
28 produces Documents only to the Issuing Party, to the extent practical given

1 the data volume, productions by a non-party shall be produced by the Issuing
2 Party to all other Parties within seven days.

3 **H. Miscellaneous Provisions**

4 The following specifications govern the production of all Documents regardless
5 of source, unless otherwise noted in the ESI Protocol:

- 6 **1. Custodian or Originating Source.** The custodian or originating source shall
7 be identified in the Custodian field of the database load files. If there is more
8 than one custodian all sources shall likewise be identified in the “All
9 Custodians” field. Documents found in the possession of a natural person (or
10 on a natural person’s hardware or storage media) shall be produced in such
11 fashion as to identify the natural person. Documents found in the possession
12 of a department, group, entity, or other common facility (*e.g.*, office, file
13 room, archive, network storage, file share, back up, hard drive, etc.) shall be
14 produced in such a fashion as to identify the department, group, entity, or
15 facility. A Producing Party shall use a uniform description of a particular
16 custodian across productions.
- 17 **2. Foreign Language.** Foreign language text files and metadata shall be
18 delivered with the correct encoding to enable the preservation of the
19 Documents’ original language.
- 20 **3. Dates.** All Documents shall be processed to show the data and time in
21 Coordinated Universal Time (“UTC”). Dates and times must be
22 concatenated into a single field, with a format of MM/DD/YYYY
23 HH:MM:SS and must be consistent within any one field. Date delimiters,
24 such as slashes and colons, must be consistent across all fields.
- 25 **4. Production Media.** The preferred means of producing Documents is via
26 secure FTP or secure file share. However, Documents may also be provided
27 via CD, DVD, flash drive, or hard drive if (a) the size of the production
28 exceeds the size limitations applicable to the Producing Party’s secure FTP

1 or file share or (b) if the interest of preserving the confidentiality of the
2 information produced outweighs the speed and efficiency of producing
3 Documents via secure FTP or secure file share. To the extent possible,
4 physical media shall be write-protected before it is produced.

5 **5. Naming Convention for Production Media.** Whether produced via secure
6 FTP, file share, or physical media, the files produced shall be combined into
7 a compressed file such as .zip, .rar, etc. If the production is made using
8 physical media, the media shall be labeled to include (a) text referencing that
9 it was produced in *In Re: Kia Hyundai Vehicle Theft Marketing, Sales*
10 *Practices, and Products Liability Litigation, No. 8:22-ml-03052-JVS-KES*;
11 (b) the Bates number range of the materials contained on the media; (c) the
12 filename(s) of the compressed file(s); and (d) the date of production.

13 **6. Replacement Productions.** Any replacement production will be transmitted
14 with a cover letter or email to identify the production as a replacement and
15 cross-reference the “Begin Bates” and “End Bates” of the Documents being
16 replaced. The name of the document production shall indicate that it is a
17 replacement production. If the replacement production is being transmitted
18 by physical media, the media shall include the phrase “Replacement
19 Production.”

20 **7. Encrypted Data.** To the extent data is encrypted before it is produced, the
21 Producing Party shall contemporaneously transmit the credentials necessary
22 to decrypt the data.

23 **8. Non-Waiver.** Nothing in this ESI Protocol shall be interpreted to require
24 disclosure of irrelevant information or relevant information protected by the
25 attorney-client privilege, work-product doctrine, or any other applicable
26 privilege or immunity. The Parties do not waive any objections to the
27 production, discoverability, admissibility, or confidentiality of Documents.
28

1 **9. Protective Order.** All productions are subject to the Protective Order and
2 any subsequent amendments or addenda entered by the Court in this Action.

3 **VII. ASSERTIONS OF PRIVILEGE**

4 **A. Production of Privileged Documents.**

5 Pursuant to Fed. R. Evid. 502(d), the production of a privileged or work-product-
6 protected document, whether inadvertent or otherwise, does not operate as and is not a
7 waiver of privilege or protection from discovery in this case or in any other federal or
8 state matter or proceeding.

9 **B. Privilege Logs**

10 Privilege logs shall be provided in Excel format within 60 days of the date of
11 production for all documents withheld on privilege grounds, and contain the following
12 information:

- 13 1. a sequential number associated with each Privilege Log record;
- 14 2. if applicable, the date the document was created, the date it was last modified,
15 and the date it was sent;
- 16 3. if applicable, the Bates numbers of documents redacted, and a reference
17 number for each row containing the information of documents withheld in
18 their entirety;
- 19 4. to the extent reasonably available, the identity of all persons who sent,
20 authored, signed, or otherwise prepared the Documents, their email
21 addresses (if the withheld document is an email), and identification of which
22 of them are attorneys;
- 23 5. to the extent reasonably available, the identity of all persons designated as
24 addressees or copyees along with other information about them necessary for
25 the requesting Party to assess the privilege (*e.g.*, title, department, job
26 function, etc.) and identification of which of them are attorneys;
- 27 6. the title or subject of a document to the extent the title does not reveal
28 privileged or work-product protected information;

- 1 7. a description of the contents of the document that, without revealing
2 information itself privileged or protected, is sufficient to understand the
3 subject matter of the document and the basis of the claim of privilege or
4 immunity;
5 8. the type or nature of the privilege asserted (*i.e.*, attorney-client privilege;
6 work-product doctrine).

7 **C. Logging of Document Families**

8 Documents shall be logged individually and shall not be logged on the family
9 level. For document families in which fewer than all the Documents are withheld or
10 redacted as privileged or protected, the privilege log entry for the withheld document(s)
11 shall identify the Bates number of the produced family member.

12 Attorney-client privileged communications exclusively between a Party and its
13 outside counsel regarding the subject matter of this Action and created after the filing of
14 this Action or any lawsuits consolidated in or related to this Action need not be placed
15 on a privilege log. Work product created by counsel after commencement of this Action
16 or any lawsuits consolidated in or related to this Action need not be placed on a privilege
17 log.

18 In the interest of the Parties' time, and to minimize litigation costs, the Parties will
19 negotiate in good faith (i) the exclusion of categories of Documents from the privilege
20 log that while technically responsive and privileged, are relatively incidental to the issue
21 in the litigation, (ii) the logging of certain Documents on metadata privilege logs, and
22 (iii) categories of Documents that a Producing Party may log categorically rather than
23 document-by-document, the reasons therefore, and proposed log format and categories
24 proposed.

25 **VIII. MODIFICATION**

26 **A. Modification by Agreement**

27 Any practice or procedure set forth herein may be varied by agreement between
28 the Parties, which will be confirmed in writing, where such variance is deemed

1 appropriate to facilitate the timely and economical exchange of Documents. Before
2 seeking Court intervention, the Parties shall meet and confer in good faith regarding any
3 modification.

4 **B. Modification by Court Order**

5 Nothing in this Protocol waives the right of any Party to petition the Court for an
6 Order modifying the terms upon good cause shown, provided, however, that counsel for
7 such Party must first meet and confer with the counsel for the opposing Party and the
8 Parties shall use reasonable best efforts to negotiate an exception from or modification
9 to this Protocol prior to seeking relief from the Court.

10
11 Dated: April 5, 2023

Respectfully Submitted.

12
13 By: /s/ Steve W. Berman

Steve W. Berman, Esq.

HAGENS BERMAN SOBOL SHAPIRO LLP

1301 Second Avenue, Suite 2000

Seattle, WA 98101

14
15
16
17 By: /s/ Elizabeth A. Fegan

Elizabeth A. Fegan, Esq.

FEGAN SCOTT LLC

150 S. Wacker Dr., 24th Floor

Chicago, IL 60606

18
19
20
21 By: /s/ Kenneth B. McClain

Kenneth B. McClain, Esq.

HUMPHREY FARRINGTON & McCLAIN

221 W. Lexington Ave., Suite 400

Independence, MO 64050

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By: /s/ Roland Tellis
Roland Tellis, Esq.
BARON & BUDD, P.C.
15910 Ventura Blvd., Suite 1600
Encino, CA 91436

*Consumer Class Action Leadership Counsel and
Counsel for Plaintiffs*

By: /s/ Gretchen Freeman Cappio
Gretchen Freeman Cappio
KELLER ROHRBACK L.L.P.
1201 Third Avenue, Suite 3200
Seattle, WA 98101

*Plaintiffs' Governmental Entities
Committee Chair*

By: /s/ Peter J. Brennan
Peter J. Brennan, Esq.
JENNER & BLOCK LLP
353 North Clark Street
Chicago, IL 60654-3456


Counsel for Defendants

1 **ORDER**

2 Good cause appearing, the Court hereby approves this Order No. 7: Establishing
3 the Protocol for the Production of Documents and Electronically Stored Information
4 (“ESI”) and Privilege Logs.

5
6 **IT IS SO ORDERED.**

7
8 Dated: April 10, 2023

9 
10 _____
11 The Honorable James V. Selna
12 United States District Judge
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1 **SIGNATURE ATTESTATION**

2 Pursuant to Local Rule 5-4.3.4(a)(2)(i), I, Peter J. Brennan, hereby attest that Steve
3 W. Berman, Elizabeth A. Fegan, Kenneth B. McClain, Roland Tellis, and Gretchen
4 Freeman Cappio, on whose behalf this filing is also submitted, have concurred in the
5 content of this [Proposed] Order No. 6: Establishing the Protocol for the Production of
6 Documents and Electronically Stored Information (“ESI”) and Privilege Logs and have
7 authorized its filing.

8
9 Dated: April 5, 2023.

Respectfully Submitted.

10
11 By: /s/ Peter J. Brennan

12 Peter J. Brennan, Esq.
13 JENNER & BLOCK LLP
14 353 North Clark Street
Chicago, IL 60654-3456

15 *Counsel for Defendants*
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Appendix 1
ESI Metadata and Coding Fields

- A. For scanned Hard-Copy Documents, the Producing Party will provide the Metadata fields below.

FIELD NAME	FIELD DESCRIPTION
Begin Bates	The production Bates number associated with the first page of a Document.
End Bates	The production Bates number associated with the last page of a Document.
BeginFamily	Begin Bates number of first page of the parent Document of family of attachments.
EndFamily	End Bates number of the last page of last attachment to a family of Documents.
Pages	Total number of pages in the Document.
TextPath	Link to text file for the document.
Placeholder	Identifies a Document has a placeholder image.
File Extension	The extension of the file.
Custodian	Identification of the custodian(s) from whom the file was sourced.
All Custodians	Identification of all custodians of the document.
Confidentiality	Confidentiality designation.
Redacted	(Y/N) field that identifies whether the document is redacted.
Production Volume	Production volume number (e.g., VOL001, VOL002, etc.).
Producing Party	Name of Party producing the Document.

- B. For Documents that were originally stored in electronic format, all fields below should be provided, to the extent reasonably feasible. Unless otherwise agreed by the Parties, the field-naming conventions shall be as stated below, and shall be consistently applied across all productions:

FIELD NAME	FIELD DESCRIPTION
Begin Bates	The production Bates number associated with the first page of a Document.
End Bates	The production Bates number associated with the last page of a Document.
BegAttach	Beginning Bates number of the attached documents
EndAttach	Ending Bates number of the attached documents
BeginFamily	Begin Bates number of the first page of parent Document of family of attachments.
EndFamily	End Bates number of the last page of last attachment to a family of Documents.

FIELD NAME	FIELD DESCRIPTION
AttachCount	Number of document attachments.
AttachNames	Native file names of each individual attachment, separated by semicolons.
Custodian	Identification of the custodian(s) from whom the file was sourced.
All Custodians	Identification of all custodians who the Producing Party agreed to produce and where a duplicate of the Document was de-duplicated when processing the documents.
File Path	The file path from which the document was collected
All Paths	Identification of all file paths for duplicate copies.
Author	Author field extracted from the Metadata of a Document or other creator identified for the Document.
From	From field extracted from the Metadata of an email message.
To	To field extracted from the Metadata of an email message.
Cc	Cc field extracted from the Metadata of an email message.
Bcc	Bcc field extracted from the Metadata of an email message.
Pages	Total number of pages in the Document.
Date Received	Date and time received (MM/DD/YYYY HH/MM/SS).
Date Sent	Date and time sent (MM/DD/YYYY HH/MM/SS).
Date Created	Date and time created (MM/DD/YYYY HH/MM/SS).
Date Modified	Date and time that a Document was last modified (MM/DD/YYYY HH/MM/SS).
Last Modified By	Identification of person(s) who last modified a Document.
Message Id	Unique Message Id.
In Reply To	Message ID of email that instant email is in reply to.
Subject	Subject line extracted from an email, e-document, or e-attachment.
Filename	The full name of the Native File.
File Extension	The extension of the file.

FIELD NAME	FIELD DESCRIPTION
File Size	The size of the file in bytes.
MD5 Hash	The MD5 hash value of a Document.
SHA1 Hash	The SHA1 hash value of a Document.
Application	Name of the application used to open the file.
NativePath	The relative path to the native file for this Document.
TextPath	The relative path to the text file for this Document.
Redacted	Whether a Document has redactions (Y/N).
Placeholder	Whether a Document has a placeholder image (Y/N).
Confidentiality	Level of Confidentiality assigned.
Track Changes	Document has track changes (Y/N).
Hidden Content	Identifies documents with hidden content (i.e., hidden rows, columns, sheets, or slides).
Speaker Notes	Document has speaker notes (Y/N).
Has Comments	Indicates there are comments in the document.
Production Volume	Production volume number (e.g., V001, V002, etc.).
Producing Party	Name of Party producing the Document.