

1. A description of the steps taken by [party] to identify, search for, collect, organize, and produce Documents in this case.
2. Identification of each person who participated in the identification, search for, collection, organization, and production of Documents in this case, and an explanation of what each such person did.
3. [Party's] Document retention and destruction policies and its compliance with those policies.
4. [Party's] computer systems, networks, or databases that might store or contain Documents, data, and communications, including, but not limited to e-mail, responsive to [adversary's discovery requests] or relevant to the subject matter of the claims or allegations asserted in the complaint.

The designee(s) shall bring with them to the deposition any Document retention and destruction policies, as well as documents related to compliance with those policies.

Dated this __ day of __, 2008.

Attorney