

VIII.H | METADATA

Counsel are encouraged to discuss:

1. The types of metadata that are ordinarily maintained.
2. The potential relevance of the metadata.
3. The importance of reasonably accessible metadata to facilitate the parties' review, production and use of ESI.
4. The locations of metadata that will be sought in discovery.

Except as otherwise ordered by the Court, once produced, metadata is reviewable without notice to the producing party.