

Appendix 2

Checklist of Technology Issues to Discuss with Opposing Counsel

I. GENERAL COMMUNICATIONS

1. Correspondence, wherever possible, to be sent by email? _____
2. If so, encrypted? Or with other security arrangements as follows: _____

2. Form for written communications
 - A. "Formal" correspondence normally to be sent as
 - (a) Letter sent as body of an email, under firm letterhead _____
 - (b) Scanned version of letter, sent as attachment _____
 - (c) If (b), in what format?
 - PDF _____
 - If PDF, with text embedded? _____
 - Word _____
 - WordPerfect _____
 - B. Email generally okay for "informal" communications (scheduling matters, general information requests, etc.)? _____
 - C. "Safe Zone" understanding for candid email discussions between counsel _____
3. Maximum file size for emails? If so, max. size = 2 MG / 5 MG / 10 MG? _____
4. "Large" documents or document packages (ie over 10 MG / 20 MG / 50 MG / 100 MG) normally to be sent
 - As CD-R or DVD-R _____
 - By download from website _____
 - URL for download (ours) _____
 - URL for download (theirs) _____

II. COURT DOCUMENTS

1. Electronic filing - Who will be filing electronically? Us? ____ Them? ____ _____
2. Agreement to accept *delivery* of court documents sent electronically (whether *filed* electronically or not)? _____
3. Paper copies also required? Yes ____ No ____ _____

4. Email addresses for court documents delivered electronically _____
- Ours: Counsel's normal address, or _____
 - Theirs: Counsel's normal address, or _____
5. Format for court documents sent electronically
- PDF (image only) _____
 - PDF (w/ text embedded) _____
 - Other _____
6. Acknowledge receipt by:
- Acknowledgment copy of cover letter, signed and returned? _____
 - Email read receipt? _____

III. DOCUMENT DISCOVERY

1. Should a formal Electronic Document Protocol be considered? If so, staff members to be involved in discussions and next steps to be taken _____
- _____
- _____
- _____
2. Agreement to exchange lists of documents in electronic form? _____
3. Format for document lists
- Tab delimited ASCII file _____
 - MS Excel Spreadsheet _____
 - MS Access _____
 - CT Summation format _____
 - Concordance _____
 - FTI Ringtail _____
 - Word processing table format (Word / WordPerfect) _____
 - Other _____
4. Fields to be used in document lists exchanged electronically
- Default fields as per Practice Direction _____
 - **Document ID** / Host document no / **Date** / Est Date / **Document type** / **Author/Author Organization** / **Recipient/Recipient Organization** / Title/description / Parties / Source / Non-Paper Record / Redacted / Basis of Redaction / Status (copy vs original) / No of Pages / _____

[**Bold face** indicates Practice Direction default fields]

5. Copies of documents to be exchanged in electronic format? _____
6. If so, all documents? Or only certain documents, as follows: _____

7. File formats for documents to be exchanged in electronic form
- A. Images of paper records
- Resolution: 300 dpi? Other? _____ _____
 - TIFF (Single page) _____
 - TIFF (Multi-page) _____
 - PDF (image only) _____
 - PDF (text embedded, where "convenient") _____
 - Other _____

 - OCR versions? Of all documents? Or only of the following _____ _____
- B. Non-paper documents
- In native format _____
 - Exceptions? _____ _____
8. Colour images of colour paper records? Yes _____ No _____ _____
9. Oversized reduced to 8½ x 11? Yes _____ No _____ _____
10. Imaging arrangements and cost sharing
- Each party to arrange separately and bear own costs? _____
 - Parties will use same independent service provider? (Name of service provider: _____) _____
 - If so, overall imaging costs will be: Split equally? / Portion paid according to number of documents imaged? / Other arrangement: _____ _____
 - Cost splitting arrangements to be discussed further and decided later? _____
11. Document exchange via:
- CD-R _____
 - To be uploaded by parties to secure site. URL _____ _____