

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

CHARLESTON DIVISION

IN RE: AMERICAN MEDICAL SYSTEMS, INC.,
PELVIC REPAIR SYSTEMS PRODUCTS LIABILITY LITIGATION

MDL No. 2325

THIS DOCUMENT RELATES TO ALL CASES

**PRETRIAL ORDER # 15
(Stipulation for the Production of Documents
and Electronically Stored Information)**


In order to meet their responsibilities under the Federal Rules of Civil Procedure relative to production of electronically stored information, and to address the method of production of physically stored information, counsel for the plaintiffs and American Medical Systems, Inc., (“AMS”) have stipulated to and petitioned the court to enter the following Stipulation for the Production of Documents and Electronically Stored Information in this matter, attached as Exhibit A.

It is **ORDERED** that the Stipulation attached as Exhibit A applies to plaintiffs and AMS in all actions that are or become a part of MDL 2325, until further order of the court.

The court **DIRECTS** the Clerk to file a copy of this order in 2-12-md-2325 and it shall apply to each member related case previously transferred to, removed to, or filed in this district, which includes counsel in all member cases up to and including civil action number 2-12-cv-04873. In cases subsequently filed in this district, a copy of the most recent pretrial order will be provided by the Clerk to counsel appearing in each new action at the time of filing of the complaint. In cases subsequently removed or transferred to this court, a copy of the most recent

pretrial order will be provided by the Clerk to counsel appearing in each new action upon removal or transfer. It shall be the responsibility of the parties to review and abide by all pretrial orders previously entered by the court. The orders may be accessed through the CM/ECF system or the court's website at www.wvsc.uscourts.gov.

ENTER: August 30, 2012



Joseph R. Goodwin
Joseph R. Goodwin, Chief Judge

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EXHIBIT A

**STIPULATION FOR THE PRODUCTION OF DOCUMENTS AND
ELECTRONICALLY STORED INFORMATION**

I. GENERAL PROVISIONS

The parties will prepare their discovery disclosure and production documents in accordance with the agreed-upon specifications set forth below:

A. Prior Productions. If there are instances where a party is ordered to produce physically-stored information or electronically-stored information that was previously produced in another case, proceeding or government investigation, the producing party should make best efforts to comply with this Stipulation. If for some reason the producing party believes compliance with this Stipulation is too burdensome for the instances of previously produced documents, the parties will meet to arrive at a mutually acceptable format that provides the receiving party with a production that can be reasonably accessed and used by the receiving party.

B. Privilege Log. The parties shall provide privilege logs in accordance with Fed. R. Civ. P. 26(b)(5).

II. PRODUCTION OF PHYSICALLY STORED INFORMATION

A. TIFFs. Each hardcopy document shall be scanned as single page, Group IV compression TIFF images using a print setting of at least 300 dots per inch (DPI). Each image shall have a unique file name, which is the Bates number of the first page of

the document. To the extent technically available through the use of purely automated methods, and provided that no extra costs be incurred, original document orientation shall be maintained (i.e., portrait to portrait and landscape to landscape). Each document shall be produced intact (single documents shall not be split into multiple records).

B. Metadata Fields. With the exception of those hardcopy documents that were scanned and produced by counsel for American Medical Systems, Inc. (“AMS”) in other pending litigation prior to the date of entry of this Stipulation, as defined in footnote 1 below,¹ the following information shall be produced and provided in the data load file at the same time that the TIFF images and the Optical Character Recognition (OCR) acquired text files are produced. Each metadata field shall be labeled as listed below:

- (a) Beginning Production Number (ProdBeg),
- (b) Ending Production Number (ProdEnd),
- (c) Beginning Attachment Production Number (BegAttach),
- (d) End Attachment Production Number (EndAttach),
- (e) Custodian/Source,
- (f) Confidentiality, and
- (g) Document Type.

C. OCR Acquired Text Files. For each hardcopy document, a single text file containing the OCR acquired text shall be provided along with the image file and metadata. The text file name shall be the same as the image file name to which it corresponds.

¹ Counsel for AMS shall identify the entire range of bates numbers scanned and produced and provide a general summary as to the documents produced within that range for the following matters as of the date of this stipulation: Carpenter (CA), Lemon (IN), Duckworth (TX) and the consolidated litigation programs in Minnesota and Delaware.

D. Database Load Files/Cross-Reference Files. Documents shall be provided with (a) a delimited metadata file (.dat or .txt) and (b) an image load file (.lfp or .opt), as detailed in Appendix 1.

E. Bates Numbering. All images must be assigned a Bates number that shall always: (1) be unique across the entire document production, (2) maintain a constant length (zero/0-padded) across the entire production, (3) contain no special characters or embedded spaces, and (4) be sequential within a given document. If a Bates number or set of Bates numbers is skipped in a production, the producing party will so note in a cover letter accompanying the production.

F. Attachments – Parent-Child Relationships.

With the exception of those hardcopy documents that were scanned and produced by counsel for AMS prior to the date of entry of this Stipulation, as discussed in footnote 1 above, the Parent-child relationships (the association between an attachment and its parent document) shall be preserved. When attachments and embedded files are combined with their parent documents, the BegAttach and EndAttach fields, listing the unique beginning and ending number for each attachment or embedded document, must be included in the data load file.

G. Unitizing of Documents. With the exception of those hardcopy documents that were scanned and produced in other pending litigation by counsel for AMS prior to the date of entry of this Stipulation, as discussed in footnote 1 above, distinct documents shall not be merged into a single record, and single documents shall not be split into multiple records (i.e., paper documents should be logically unitized). In the case of an organized compilation of separate documents – for example, a binder containing several separate documents behind numbered tabs – the document behind each tab should be scanned separately, but the relationship among the documents in the binder should be reflected in proper coding of the BegAttach and EndAttach fields. The parties will make their best efforts to unitize documents correctly.

III. PRODUCTION OF ELECTRONICALLY STORED INFORMATION

A. Culling. The parties shall meet and confer to discuss the following in an effort to reduce the number of documents to be reviewed during the discovery process: search term culling, file type culling, de-duplication of documents, and date restrictions. In the event of a dispute regarding the search methodology or technology, the parties shall meet and confer to discuss any methodology or technologies being employed to conduct searches for and production of ESI.

B. System Files. Common systems and program files need not be processed, reviewed or produced. To the extent collected, the producing party shall keep an inventory of the system files not being produced and the criteria (e.g., non-human readable file, etc.) for not processing the files. In the event of a dispute regarding such matter, the parties shall meet and confer to discuss disclosure of inventory of non-produced files and criteria for non-processing of same.

C. Email. Email shall be collected from the producing party's email store (e.g., Microsoft Exchange, Lotus Notes, etc.). Metadata and header fields shall be extracted from email messages. Email messages shall be extracted from the email store.

D. De-duplication. Removal of duplicate documents shall only be done on exact duplicate documents (based on MD5 or SHA-1 hash values at the document level) and may be done across custodians and sources. Near-duplicate documents shall be produced rather than removed. The custodian associated with the first copy of a document processed will be considered the "pivot" custodian for that document (the custodian who will be used as the basis for determining which other collected documents are duplicates). After each production, the producing party shall produce an "other sources" listing of all other custodians or sources who or which possessed any duplicate copy of the document that was de-duplicated out of the production. In addition, after each production, the producing party will produce a de-duplication log that contains the Bates number of the produced

version of each de-duplicated document (for lookup purposes), and the de-duplicated custodian or source. In addition, the producing party shall provide, generally, the SourceFilePath metadata field for non-email e-documents and, generally, the “Folder” metadata field for emails.

E. Metadata Fields and Processing. Each of the metadata and coding fields set forth in Appendix 2 that can be extracted from a document shall be produced for that document. The parties are not obligated to populate manually any of the fields in Appendix 2 if such fields cannot be extracted from a document. The custodian shall be identified for all documents produced.

F. Native File Productions. To the extent that this Stipulation indicates that electronically stored information is to be produced in its native format, the parties will reserve specific Bates ranges for documents produced in native format. Any native files that are produced shall be produced, generally, with the Source File Path provided, as well as with all extracted text and applicable metadata fields set forth in Appendix 2. To the extent that the receiving party requests any custom slip sheets to accompany native files that are produced, the receiving party shall pay for the programming charges for developing those custom slip sheets.

G. TIFFs. Single page Group IV TIFF images shall be provided using at least 300 DPI print setting. Each image shall have a unique file name, which is the Bates number of the document. AMS will make reasonable efforts to produce these TIFF image files consistent with the appearance of the documents as kept in the ordinary course of business.

H. Microsoft “Auto” Feature and Macros. Microsoft Word (.doc) Microsoft Excel (.xls) and Microsoft PowerPoint (.ppt) documents should be analyzed for the “auto” features, where documents have an automatically updated date and time in the document that when processed would be inaccurate for how the document was used in the ordinary course of business. If an “auto date” is identified, the producing party will

make reasonable efforts to produce the document branded with the words “&[DATE]&[TIME].”

I. Embedded Objects. Objects embedded in Microsoft Word and RTF documents that have been embedded with the “Display as Icon” feature will be extracted as separate documents and treated like attachments to the document.

J. Compressed Files. Compressed file types (e.g., CAB, .GZ, .TAR, .Z, .ZIP) shall be decompressed in a reiterative manner to ensure that a zip within a zip is decompressed into the lowest possible compression resulting in individual folders and/or files.

K. Text Files. For each document, a single text file shall be provided along with the image files and metadata. The text file name shall be the same as the Bates number of the first page of the document. File names shall not have any special characters or embedded spaces. Electronic text must be extracted directly from the native electronic file unless the document was redacted, an image file, or a physical file. In these instances, a text file shall be created using OCR and shall be produced in lieu of extracted text. See Section II.C for OCR requirements. Except in the cases of redacted documents, the receiving party will not be required to rely upon a less accurate version of the text than the producing party. For example, if the producing party has access to extracted text from electronic document files, the receiving party shall receive extracted text as well, instead of OCR text generated from an image file.

L. Spreadsheets. Spreadsheets shall be produced in native format along with the extracted text and relevant metadata identified in Appendix 2 for the entire spreadsheet, unless redacted. The producing party may redact fields that contain non-responsive and personally identifiable information. Redacted spreadsheets shall be produced in TIFF format with the word "REDACTED" substituting the redacted text. All spreadsheets shall be treated as if designated HIGHLY CONFIDENTIAL. However, the producing party agrees to de-designate specific spreadsheets designated

as HIGHLY CONFIDENTIAL upon request of the receiving party provided that the spreadsheet is not HIGHLY CONFIDENTIAL. In addition, the receiving party agrees to, upon request of the producing party, identify those spreadsheets that the receiving party does not need for the litigation and destroy those copies of the spreadsheets that the receiving party does not need. The parties agree to meet and confer further to discuss a different process to the extent that the viewing of spreadsheets becomes an issue.

M. Microsoft PowerPoint or slide programs. PowerPoint presentations shall be produced in black and white Tiff images. PowerPoint presentations shall include all speaker notes and “hidden” slides. If the receiving party reasonably believes that there is need to review a specific PowerPoint in color, the PowerPoint shall be produced in color Tiff or JPEG images if the producing party has the presentation in color. If the receiving party reasonably believes that there is need to review a specific PowerPoint in native form, the parties agree to meet and confer regarding the production of that PowerPoint in native form. If the PowerPoint or slide program contains video or audio components, the video or audio will be produced in accordance with Paragraph O below.

N. Structured Data. The parties agree to negotiate separately regarding the production of structured database files and shared drives.

O. Audio and Video Files. Generally, audio files and video files shall be produced in their native format with the Source File Path provided if not unduly burdensome for AMS to do so. The parties agree to meet and confer if production under this format after reasonable efforts by AMS is not possible. For the purposes of identifying metadata to be collected in Appendix 2, audio and video files will be considered electronic documents.

P. Exceptions. The producing party shall make reasonable efforts to limit the extent of documents that cannot be processed.

Q. Additional ESI Production Protocols.

1. Database Load Files/Cross-Reference Files. Documents shall be provided with (a) a delimited data file (.DAT or .CSV) and (b) an image load file, as detailed in Appendix 1.

2. File Size Limitation/Non-Standard Files. The format of production of unusually large files and non-standard electronic files, large oversized documents (e.g., blueprints) etc., will be discussed before production to determine the optimal production format.

3. Replacements. All files that are replaced for any reason must be annotated with an “-R” designation appended to the original Bates number. Any Replacement files that are produced shall be accompanied with an indication within the letter or correspondence accompanying the production that the production contains “Replacements.”

4. Clawback Procedure. Inadvertent production of documents or ESI (collectively (“Inadvertently Produced Documents”)) subject to work-product immunity, the attorney-client privilege, or other legal privilege protecting information from discovery shall not constitute a waiver of the immunity or privilege, provided that the producing party shall notify the receiving party in writing as set forth herein. In the event that a party inadvertently produces documents or ESI subject to a claim of privilege, the producing party shall, within 10 days of the discovery of the inadvertent disclosure, notify the other party in writing of the inadvertent disclosure. The producing party may, in the notice, request a “clawback” of the inadvertently disclosed material. The party receiving such clawback notice shall immediately and diligently act to retrieve the Inadvertently-Produced Documents, and all copies, including any loaded to databases, and return them to the producing party or destroy them as agreed between the parties. All notes or other work product of the receiving party, reflecting the contents of such materials, shall be destroyed and not used.

If the receiving party elects to file a motion as set forth below, the receiving party, subject to the requirements below, may retain possession of the Inadvertently Produced Documents as well as any notes or other work product of the receiving party reflecting the contents of such materials pending the resolution by the Court of the motion below, but shall segregate and not use them pending resolution of the motion. If the receiving party's motion is denied, the receiving party shall promptly comply with the immediately preceding provisions of this paragraph. No use shall be made of such Inadvertently Produced Documents during depositions or at trial, nor shall they be disclosed to anyone who was not given access to them prior to the request to return or destroy them unless otherwise ordered by the Court.

The party receiving such Inadvertently Produced Documents may, after receipt of the producing party's notice of inadvertent production, move the Court to dispute the claim of privilege or immunity, but the motion shall not assert the fact or circumstances of the inadvertent production to challenge whether the material is, in fact, privileged.

Pursuant to Fed. R. of Evid. 502, there is no waiver of privilege or work product protection in this matter or any other matter in any other jurisdiction for any document clawed-back under this clause, or for the subject matter of any such document, whether the privileged document was inadvertently provided following review or as part of a "Quick Peek" production. In the event that either party receives information produced in discovery from the other party that reasonably appears to be Inadvertently Produced Documents, the receiving party shall promptly notify the producing party in writing of the apparent inadvertent production.

IV. SUPPLEMENTAL SEARCH TERMS

A. If words, phrases, abbreviations, terms of art, idiomatic expressions, alternate spellings (or misspellings), or particular linguistic styles which are recurrent or that are unique to the Defendants, or which are otherwise not presently known to Plaintiffs, and such terms are reasonably calculated to lead to the discovery of

information relevant to this litigation, then Plaintiffs may propose a search of the Defendants' electronically-stored information using such additional search terms. As with any Request for Production or for implementation of search methodologies, any such requests may be the subject of objection, conferring and, if necessary, direction from the Court.

B. If in the course of discovery, additional custodians or sources which are recurrent, or who are otherwise not presently known to Plaintiffs, or who Plaintiffs determine may possess materials reasonably calculated to lead to the discovery of relevant evidence, are identified, Plaintiffs may request the custodial files of those additional custodians or sources. As with any Request for Production, any such requests may be the subject of objection, conferring and, if necessary, direction from the Court.

V. DATE SCOPE REGARDING ESI AND HARD COPY DOCUMENTS

The parties agree to negotiate separately regarding any date scope limitation regarding ESI and hard copy documents. However, it is recognized that the parties have a duty and responsibility to supplement their responses to discovery as set forth in the Federal Rules of Civil Procedure.

VI. ARCHIVED AND BACKUP DATA

Collection and production of responsive ESI will include archived data that is reasonably accessible. If a producing party takes the position that any backup or archived data that may contain discoverable information is not "reasonably accessible" within the definition of the Federal Rules, such sources shall be identified with sufficient particularity that the requesting party may make a motion with respect thereto.

VII. COST OF ESI

While each party expressly reserves its rights to seek costs relating to this litigation, including the costs of producing documents and ESI, initially each party will bear the costs to process and review its own documents and readily accessible ESI.

VIII. ADDITIONAL CUSTODIAN SEARCH GROUPS

Plaintiffs have agreed with AMS to a set of up to thirty (30) custodians to be searched. The parties have agreed to the following protocol for the production of emails and other electronic documents responsive to Plaintiffs' requests:

- a) On or before August 17, 2012, Plaintiffs will identify their list of the first 15 custodians to be searched. The parties agree to meet and confer regarding an extension of time of the following deadlines if AMS makes such a request after evaluating the list of 15 custodians for volume. AMS shall have ninety (90) days to complete the production of emails for these custodians. AMS shall have one hundred twenty days (120) days to complete the production of other ESI for these custodians. AMS shall begin producing responsive ESI on a rolling basis beginning not more than thirty (30) days after receipt of the list of custodians. Additional productions shall be made a minimum of every thirty days until production has been completed.
- b) Within 10 days of the completion of the deposition of AMS's corporate representative on corporate structure and organization, Plaintiffs shall submit a second list of up to 15 additional custodians to be searched. The entirety of the lists submitted under this paragraph and paragraph a) above shall not exceed thirty (30) custodians. The parties agree to meet and confer regarding an extension of time of the following deadlines if AMS makes such a request after evaluating the second list of up to 15 additional custodians for volume. Production of emails and other ESI for these additional custodians shall be completed within 150 days of submission of the second list of custodians. AMS shall produce responsive ESI on a rolling basis for the second set of up to 15 additional custodians, as described above, within 90 days of submission of the second list of custodians. Additional productions shall be made a minimum of every thirty days until production has been completed.

- c) The parties agree to meet and confer with regard to any request by Plaintiffs for additional custodians to be searched. With regard to any request for a custodian's emails to be searched under paragraphs a) or b) of this Section VIII of this Protocol, as with any Request for Production, any such request may be the subject of objection, conferring and, if necessary, direction from the Court.

IX. AGREEMENT DOES NOT WAIVE OR SUPERSEDE PARTIES' DISCOVERY RIGHTS AND/OR OBLIGATIONS UNDER THE FEDERAL RULES OF CIVIL PROCEDURE.

This agreement is without waiver or limitation of any rights of any party to discovery under the Federal Rules of Civil Procedure. The obligations of any party to this agreement to provide discovery under the Federal Rules of Civil Procedure are not limited or superseded by this agreement.

CONSENTED TO BY:

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APPENDIX 1: FILE FORMATS

Image Load Files

- Every document referenced in a production image load file shall have all corresponding images, text and data.
- Documents shall be produced in only one image load file throughout the productions, unless that document is noted as being a replacement document in the Replacement field of the data load file.
- The name of the image load file shall mirror the name of the delivery volume, and should have a .LFP or .OPT extension (e.g., ABC001.LFP).
- The volume names shall be consecutive (e.g., ABC001, ABC002, . . .).
- The load file shall contain one row per TIFF image.
- Every image in the delivery volume shall be contained in the image load file.
- The image key shall be named the same as the Bates number of the page.
- Load files shall not span across media (CDs, DVDs, hard drives, etc.). A separate volume shall be created for each piece of media delivered.

Metadata Load Files

- The metadata load file shall use the following delimiters:
 - Column delimiter: Pipe | (ASCII 124)
 - Text qualifier: Caret ^ (ASCII 94)
 - New line: Registered sign ® (ASCII 174)
- Data for documents shall be produced in only one data load file throughout the productions, unless that document is noted as being a replacement document in the Replacement field of the data load file.

- The first record shall contain the field names in the order of the data set forth in Appendix 2.
- All date fields shall be produced in “mm/dd/yy hh:mm:ss AM” format.
- A carriage-return line-feed shall be used to indicate the start of the next record.
- Load files shall not span across media (CDs, DVDs, hard drives, etc.). A separate volume shall be created for each piece of media delivered.
- The name of the metadata load file shall mirror the name of the delivery volume, and shall have a .DAT extension (e.g., ABC001.DAT).
- The volume names shall be consecutive (e.g., ABC001, ABC002, . . .).

APPENDIX 2: ESI METADATA AND CODING FIELDS

File Name	Field Description	Populated for (email, e- documents, e- attachments, physicals)	Sample Values
ProdBeg	Bates number for the first page of the document	All	Prefix-0000001
ProdEnd	Bates number for the last page of the document	All	Prefix-0000002
BegAttach	Bates number for the first document of the attachment	All	Prefix-0000003
EndAttach	Bates number for the last document of the attachment	All	Prefix-0000005
PgCount	Number of printed pages of the document	All	2
AttachmentCount	The total number of attachments including any attachments that were not processed and the contents of additional attached containers. A value of zero (0) should be returned for any files/documents without attachments.	All	3
Custodian/Source	Custodian name produced in format: Last name, First name. Where redundant names occur, individuals should be distinguished by an initial which is kept constant throughout productions (e.g., Smith, John A. and Smith, John B.). A non-human name (i.e., server name or data name) or designation such as "loose files" can be used.	All	Smith, Jane; Smith, John A.; Smith, John B.; Taylor, Michael
Confidentiality	Indicates if the document has been designated as "Confidential" pursuant to any applicable Protective Order (e.g., "HC" for Highly Confidential docs; "Con"	All	Confidential

File Name	Field Description	Populated for (email, e-documents, e-attachments, physicals)	Sample Values
	for Confidential; "No" for non-confidential docs).		
DocumentType	Descriptor for the type of document: "File" for electronic documents not attached to emails; "email" for all emails; "Attachment" for files that were attachments to emails; and "Physicals" for hard copy physical documents that have been scanned and converted to an electronic image	All	Email
Source File Path	The directory structure of the original file for non-emails e-documents.	Only for non-email e-documents	
EmailSubject	Subject line of an email.	Email	Text of the subject line
To	To extent available, all SMTP addresses of all recipients that were included on the "To" line of the email. Multiple recipients should be delimited by a semicolon.	Email	Larry.murphy@email.com
CC	To extent available, the email addresses of all recipients that were included on the "CC" line of the email.	Email	Sstephens44@email.com
BCC	To extent available, the email addresses of all recipients that were included on the "BCC" line of the email.	Email	Ceo-gs@email.com
Attach	The file name(s) of the documents attached to emails or e-documents. E-documents with embedded documents such as documents .ZIP file should have the embedded document name(s) listed here.	Email, e-documents	AttachFilename1.ext

File Name	Field Description	Populated for (email, e- documents, e- attachments, physicals)	Sample Values
	Multiple files should be delimited by a semicolon.		
DocDate	The parties shall use a single date for documents. ⁴	E-documents, e-attachments	mm/dd/yyyy hh:mm:ss AM
Title	Any value populated in the Title field of the document properties.	E-documents, e-attachments	Title
Subject	Any value populated in the Subject field of the document properties.	E-documents, e-attachments	Subject
Author	Any value populated in the Author field of the document properties	E-documents, e-attachments	Author
DocExt	The file extension of the document is defined as the substring of the file name which follows but does not include the last occurrence of the dot character.	Email, e-documents, e-attachments	htm
Size	Size (in bytes) of the original file.	Email, e-documents, e-attachments	1408
Folder	Email message directory	Email, e-attachments	Mailbox – Smith, Joe\Inbox\Client

⁴ The parties agree to provide one date field based on the following hierarchy:

Email (msg/eml):

-If an Email is an Appointment or Schedule/Meeting, the first valid date in the following order: Start Date, End Date, Date Sent, Date Received

-Otherwise, first valid date in the following order: Date Sent, Date Received

Email attachment or part of an archive (i.e., ZIP file)

-The first valid date in the following order: Modified, Created, Parent Sent Date, Parent Received Date

-If none of the above is available, Date Sent of closest email in set

Stand-alone File

-The first valid date in following order: Modified, Created

-To the extent multiple drafts/versions of a document exist, each draft version shall be treated as a separate document for production purposes

File Name	Field Description	Populated for (email, e- documents, e- attachments, physicals)	Sample Values
			Materials\Crivella West\
Importance	Priority	Email	Flag
Hash Value	Checksum for a file, a 128-bit value.	Email, E- documents, e- attachments	e4d909c290d0fb1ca068f f addf22cbd0
Other Sources	Since Global de-duping is being used –this field will track all other custodians that had possession of this file.	Email, E- documents, e- Attachments	First Name Last Name
From	The name and email address of the sender of the email	Email	Bart.Cole@email.com