

# eDiscovery Tips for the Legal Practitioner

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# Electronic Documents, Metadata & Format

- Electronic Document
  - Information stored in an electronic medium. (Cal. Civ. Code § 2016.020(e)).
- Metadata
  - Information about data or other information.
  - Why? Assist computers in reading files (1995 & later)
- Native Format
  - Relates to the computer program for creating, editing or viewing the file.
  - Office documents (doc, xls, wps), email (eml), web pages (htm), audio (mp3, wav), video (qt, swf, flv, wmv), financial (.qif), images (jpg, gif), etc.
- Nonnative
  - Relates to files converted to another format
  - Adobe (pdf) & tiff images

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# Metadata in Web Pages

```
<meta name="keywords" content="Eastern Alameda County Bar Association, law, legal, members, membership, Pleasanton, CA, Livermore, CA">
<meta name="description" content="Eastern Alameda County Bar Association was established to advance the legal profession through education, philanthropy, public service programs and promotion of a spirit of friendship and common interest among its members.">
<meta name="copyright" content="Eastern Alameda County Bar Association, 2002">
<title>EACBA</title>
<meta http-equiv="Content-Type" content="text/html; charset=iso-8859-1">
<script language="JavaScript">
```

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# Metadata in Office Documents

Statistic name	Value
Pages	6
Paragraphs	98
Lines	2458
Words	10060
Characters (with spaces)	12789

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# Metadata in Email

```
Return-Path: <jerprett@att.net>
Delivered-To: grplaw@att.net
Received: (gnssml) 1456 received from network, 11 Nov 2009 17:09:01 -0000
Received: from mx077.futurequest.net (mx077.futurequest.net [69.5.6.178])
  by g105.futurequest.net (69.5.6.191)
  with FQDN via TCP, 11 Nov 2009 17:09:01 -0000
Received: (gnssml) 776 received from network, 11 Nov 2009 17:09:02 -0000
Received: from hanna.futurequest.net (hanna.futurequest.net [69.5.16.3])
  by mx077.futurequest.net (10.2.1.17)
  with SMTP via TCP, 11 Nov 2009 17:09:02 -0000
Received: (gnssml) 8022 received from network, 11 Nov 2009 17:09:00 -0000
X-Original-From: [18.1.1.238.33]
Message-ID: <001901caf2716a77693106401a3c0@jerprett071049>
Reply-To: "Jerry Prettyman" <jerprett@att.net>
From: "Jerry Prettyman" <jerprett@att.net>
To: "Gerald R. Prettyman" <grplaw@att.net>
Subject: Fax Operation Paperback
Date: Wed, 11 Nov 2009 09:08:52 -0800
```

- Sending address & Destination address
- Interim Servers & IP addresses
- IP address, name & domain of email server
- IP address of sending computer (Comcast)
- Name of sending computer (my desktop)

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# Metadata in Adobe (pdf)

```
%PDF-1.4
%Çÿÿ
5 0 obj
<</Length 6 0 R/Filter /FlateDecode>>
<</Producer(GPL Ghostscript 8.15)
/CreationDate(D:20100216134547)
/ModDate(D:20100216134547)
/Title(Microsoft Word - eDiscovery2010-0201.doc)
/Creator(PScript5.dll Version 5.2.2)
/Author(Owner)>>
```

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