

Illustrative Statement of Work for Document Review Services

Description of Womble Carlyle Services and Specific Client Deliverables

Womble Carlyle Sandridge & Rice, PLLC staffs and operates Document Review facilities. The following deliverables are completed by these facilities as requested:

1. A Production Set of responsive and non-privileged documents selected in compliance with applicable rules, laws, corporate policies, and directives and guidelines developed jointly by in-house counsel, outside counsel and Womble Carlyle. The documents in the Production Set shall be in the format required for the case and shall include all required Bates numbering, confidentiality and protective order designations and branding, required redactions, and any searchable text or data required to be produced with the document images.
2. A Privilege Log listing responsive documents for which privilege is claimed, including a description of the privilege and the documents sufficient to allow others to evaluate the privilege claim.
3. As requested, a Redaction Log listing responsive documents from which redactions have been made and identifying the basis for making the redaction.
4. As requested, a Source Log listing the source from which each responsive document was obtained and identifying the custodian, or otherwise indexing or listing the documents as required for the case.
5. Documentation of the Collection, Search and Review strategies and procedures, along with a description of any generally-applicable decisions or judgments made in the course of collecting and reviewing the document ("Key Decisions Log").
6. As requested, a set of important or key documents identified during the review as important to the case, selected in compliance with directives and guidelines developed jointly by in-house counsel, outside counsel and Womble Carlyle.
7. As requested, an Initial Witness Set of documents for a given witness, which culls the large set of documents related to the witness to a set requiring further review by outside litigation counsel and which is assembled in compliance

with directives and guidelines developed jointly by in-house, outside counsel and Womble Carlyle.

8. As requested, a Subject Matter Set of documents for a given subject matter, which compiles the documents related to the subject matter for further review by outside litigation counsel and which is assembled in compliance with directives and guidelines developed jointly by in-house counsel, outside counsel and Womble Carlyle.
9. Other work product as requested to support Client's efforts to comply with its obligations to review and produce documents for external parties.

Included Tasks

The following tasks are typically included to generate the defined deliverables described above:

1. Coordination of the collection of relevant potentially responsive documents from Client sources including both hard copy documents and Electronically Stored Information ("ESI"), working with Client IT staff and various departments and employees whose information is at issue in the particular litigation.
2. Documentation and tracking of collection procedures, processes and results, and decisions made in the course of executing the collection process.
3. "First-Pass" Review to identify responsive documents, make required confidentiality designations, identify potentially privileged documents, identify important documents, and to otherwise narrow and categorize the universe of documents from which the Production Set will be drawn.
4. Second Review, QC Review and other Quality Assurance, to check, improve, strengthen or focus the First-Pass Review or other tasks completed by initial review teams.
5. If required by the case, redaction of documents to obscure personally identifiable information or to make other required redactions.
6. Review to create an Initial Set of Witness documents or to create a Subject Matter Set of documents, or other review to provide more detailed analysis of the documents including creation of specialized document sets as required for the case.

7. "Confidentiality" Review to identify documents which need protection in order to maintain the confidentiality and security of proprietary and other valuable company information or to comply with Client obligations to protect the confidentiality of others.
8. "Privilege" Review to identify privileged information and the basis for the privilege claim, including the preparation of the privilege log.
9. As requested, coding of documents to extract pertinent specified information and preserve it in databases for searching, categorizing, indexing and organizing the documents for later use.
10. Tracking of production history (case and date produced), privilege calls (whether a document appeared on a privilege log in another case) and confidentiality (whether a document was treated as confidential in another case) in order to allow consistent production and use across various cases.
11. Supervision of these tasks and coordination and communication with in-house and outside counsel as necessary to support Client's overall litigation directives.

Staffing

The following staff will be provided at the levels specified in our service agreement:

1. Law Firm Member (Partner) and Associate level leadership, supervision and control of substantive review criteria and overall implementation of review and quality assurance processes.
2. Licensed Attorney staffing of Privilege Review process.
3. Licensed Attorneys experienced in large scale document production on site and continuously available for supervision of all review processes and quality assurance procedures.
4. Member or Associate level coordination with in-house and

outside counsel regarding substantive criteria for review and substantive logistics.

5. Additional paralegal and attorney staff as needed.

Term

As agreed upon with Client.

Fees

Fees will be paid as specified in the applicable service agreement(s) except that services rendered outside the scope of any service agreement or for a period of time which is not covered by a service agreement will be invoiced monthly based upon the currently applicable hourly rate schedule or the currently applicable per page or per document rate schedule, as appropriate. In the event that the services provided are covered by both the hourly rate schedule and the per page or per document rate schedule, Client shall have the option of choosing which to apply.

Services Outside the Scope

The following services are outside the scope of this statement of work:

1. Copying and Imaging Services;
2. Document and Information Storage Services including hosting of document review databases and burning of production disks;
3. Technology Systems;
4. ESI data capture and processing prior to or to facilitate review;
5. Case or production strategy assessment other than practicalities and feasibility of production or review criteria.

We are able to assist you in arranging for or evaluating these excluded services upon request.



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