

The initially overwhelming volume of data was eventually reduced from 6TB to 71GB An Avalon client needed help responding to a government inquiry that involved a large volume of data. The client was motivated to comply with the pre-suit request in an attempt to dissuade the Department of Justice from filing a suit.

## The Challenge

The client needed to collect data from 11 of their custodians' entire digital footprint including office desktops, work laptops, and mobile devices. The initial volume of information collected was unmanageable—it consisted of roughly 20 million digital items, totaling nearly 6 TB of data.

### The Strategy

Avalon was engaged to cull the dataset to a more manageable size. First, Avalon deleted any unnecessary system files by applying de-nisting protocol in conjunction with their own custom script to isolate system files left after the de-nist was run. Secondly, we employed a custom custodial deduplication—where one can set an order of importance to the custodians. Therefore, if a duplicate file is found among three custodians, the file belonging to the most important custodian is retained and the others are withheld from the eventual review set. These two protocols alone reduced the dataset size by more than 35%.

Avalon then assisted in creation of the eventual search terms by discussing with the client and their outside counsel to determine exactly what they were looking for. We translated the plain language into complex Boolean search strings. Some terms turned out to be too inclusive and had to be re-worked several times. Eventually, after numerous tweaks to the search terms, the volume of data to be reviewed was reduced to 135 GB and roughly 351,000 items. This dataset was hosted on Avalon's Relativity platform.

Because this was still a large amount of data to review, the client hired an outside managed review service to take a first pass and used their outside counsel in the quality control stage. The client was initially hesitant to apply Relativity analytics due to the costs, and forged ahead with a straight linear managed review. At the peak of the review, more than 100 Relativity users were coding in the database. During the quality control rounds, however, it was discovered that certain parts of e-mail threads were being coded drastically different, which would cause certain items to be produced that should be withheld. The client decided to employ Relativity analytics in order to utilize e-mail threading for the sake of a quality control process. After threading was applied, the quality control round corrected the errors and the amount produced was 71 GB consisting of 97,317 items—a drastic decrease from the initial 20 million

#### The Results

The law suit never materialized, in large part, due to the cooperation and data provided by the client. The client also learned the importance and benefits of using e-mail threading at the beginning of the eDiscovery process.



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