

Offensive Discovery Toolkit Quick Takeaways

- **Plaintiff Fact Sheet Order/Targeted Discovery Requests**
 - Requiring disclosure and production of ESI
- **ESI Protocol**
 - Specifying production format and search methodology for ESI
- **Protective Order**
 - Favorable to client and OUSA data protection laws
- **FRCP 26(g) Certifications**
 - Regarding ESI productions
- **ESI Guidance**
 - Instructing counsel regarding obligations to identify, preserve, collect, and produce ESI
- **Deficiency Protocol Order**
 - Setting out deficiency process for plaintiffs' ESI productions
- **ESI Authorizations**
 - For release of plaintiffs' ESI directly from third-party providers
- **Review Plan**
 - Formalized strategy for substantive review of ESI

