

Leveraging Technology in eDiscovery

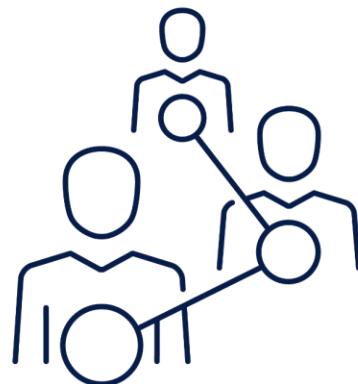
FOR LEGAL PROFESSIONALS



TRANSPERFECT
LEGAL

BY THE
NUMBERS

**\$1.16
BILLION
AND GROWING**



9,000+
**GLOBAL
EMPLOYEES**



6
CONTINENTS

46
COUNTRIES

160+
CITIES
WORLDWIDE

1992 YEAR
FOUNDED

30 YEARS OF
GROWTH

9K MATTERS
ONBOARDED

**FORTUNE
500** MAJORITY OF
CORPORATE
LEGAL DEPTS.

**100
PERCENT** AM LAW 200
& GLOBAL 100
LAW FIRMS

170+ LANGUAGES
SUPPORTED

TRANSPERFECT
LEGAL

Today's Roadmap



Big data & other issues



Investigative analytics
& AI



eDiscovery &
document review



Q&A

Big Data & other issues



The 'Big Data' Era

- ExxonMobil's employees create 5.2 million new email messages every single day.
- Web-based business transactions have reached over 450 billion deals per day.
- Walmart processes 1 million customer transactions every hour, which are stored in data bases of over 2.5 petabytes of data.
- The volume of business data worldwide, across all companies, doubles every 1.2 years.

Hyperlinked Documents



What they are, and what they're not



Why they're so problematic in the eDiscovery context



The issue of versioning, and what tools can collect



What courts are saying, and where we think this is going



Investigative Analytics & AI



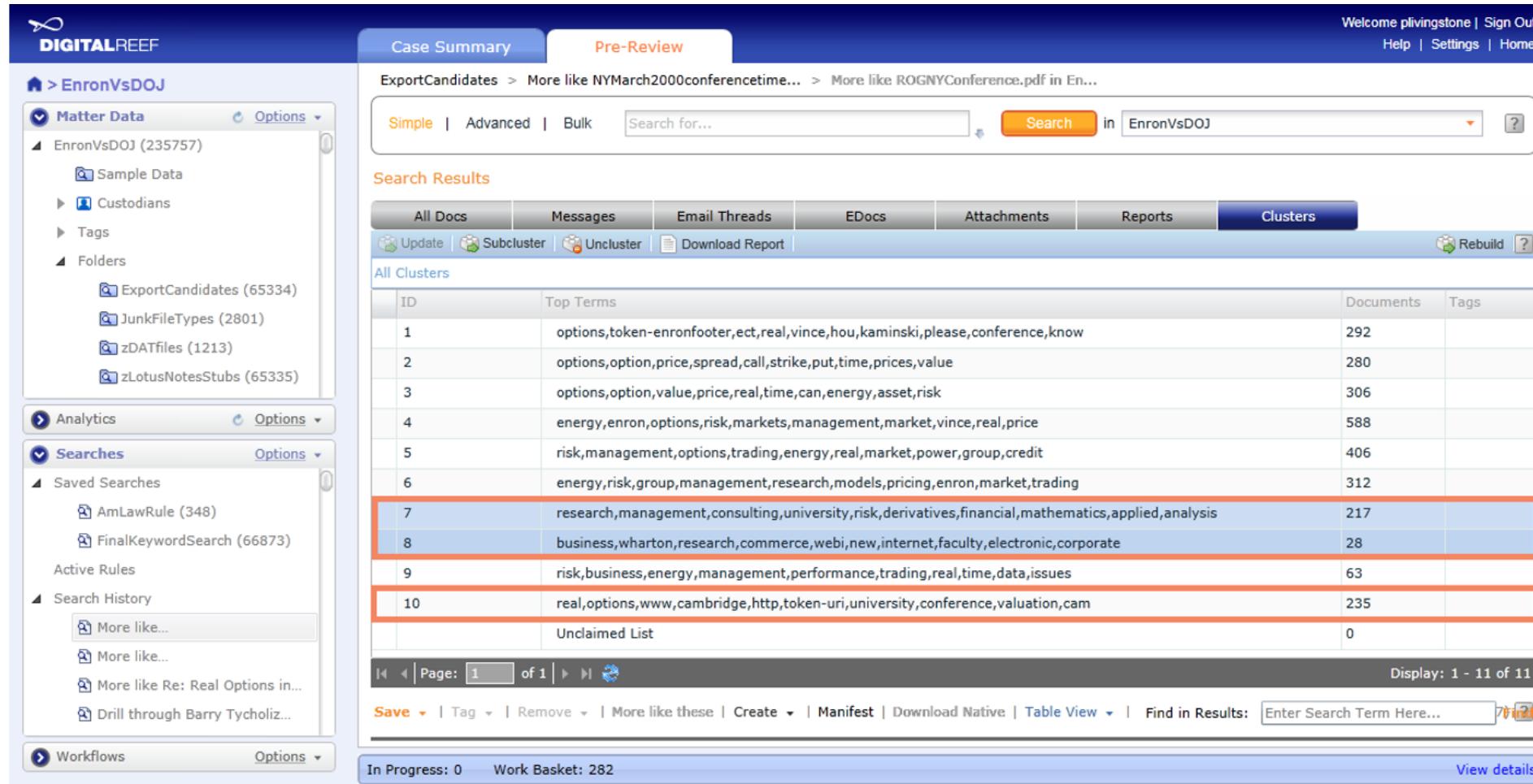
Pre-Review Analytics®: Domain Filters

The screenshot displays the DIGITALREEF Pre-Review Analytics interface. The left sidebar shows navigation options: Dashboard, Imports, Review Sets, Exports, Case Data (235757), Sample Sets (Custodians: Unassigned (0), Barry Tycholz (3412), BBchat (370), David Delaney (15655), Jeff Shankman (12266), Jeff Skilling (40657), John Lavorato (32032), Louise Kitchen (13693), Rick Bay (17556), Robert Williams (9044), Vince Kaminski (91872)), Tags, Folders, Exports and Review Sets (Discard Pile (679)), Analytics, Searches, and Workflows.

The main interface shows 'Case Data' with tabs for Simple, Advanced, and Bulk. A search bar and 'Case Data' button are at the top. The 'Reports' tab is selected, showing 'Case: EnronVsDOJ'. A 'Top Sending Domains Details' modal is open, displaying a table and a bar chart. The table lists domains with their count and size, and the bar chart shows the count for enron.com and o=enron/ou... The modal has 'Save', 'Tag', and 'Remove' buttons and an 'OK' button at the bottom. The background shows other charts: 'Top Sending Domains' (enron.com, aol.com, o=enron/ou..., hou/ect@ec..., hotmail.co...), 'Document Count by Dominant Language' (143902, 36315, 11519, 4697, 4475, 4265, 4181, 4068, 2034, 2019), and 'Count per Language' (147257, 36315, 15874, 8254, 5003, 4739, 4400, 4475, 3120, 3218).

Name	Count	Size
juno.com	314	58.5 MB
baylor.edu	237	13.5 MB
rice.edu	229	11.4 MB
mailman.enron.com	191	2.9 MB
enron.net	167	38.8 MB
cera.com	147	3.5 MB
pdx/ect@ect	146	28.1 MB
lacim.co.uk	135	8.1 MB
yahoo.com	130	4.6 MB
stanford.edu	125	4.2 MB
ciso.com	123	10.1 MB
wharton.upenn.edu	120	14.4 MB

Pre-Review Analytics®: Clustering



The screenshot shows the DIGITALREEF Pre-Review Analytics interface. The top navigation bar includes 'Case Summary' (selected), 'Pre-Review', 'Welcome plivingstone | Sign Out', 'Help | Settings | Home', and a search bar with 'Search for...' and 'Search' buttons. The left sidebar contains 'Matter Data' (selected), 'Analytics', 'Searches' (selected), and 'Workflows'. The 'Searches' section includes 'Saved Searches' (AmLawRule, FinalKeywordSearch) and 'Search History' (More like..., More like Re: Real Options in...). The main content area is titled 'Search Results' and shows a table of 'All Clusters'. The table has columns for 'ID', 'Top Terms', 'Documents', and 'Tags'. Clusters 7, 8, and 10 are highlighted with orange borders. The bottom of the interface shows 'Page: 1 of 1' and 'Display: 1 - 11 of 11', along with 'Save', 'Tag', 'Remove', 'More like these', 'Create', 'Manifest', 'Download Native', 'Table View', 'Find in Results', and search fields.

ID	Top Terms	Documents	Tags
1	options,token-enronfooter,ect,real,vince,hou,kaminski,please,conference,know	292	
2	options,option,price,spread,call,strike,put,time,prices,value	280	
3	options,option,value,price,real,time,can,energy,asset,risk	306	
4	energy,enron,options,risk,markets,management,market,vince,real,price	588	
5	risk,management,options,trading,energy,real,market,power,group,credit	406	
6	energy,risk,group,management,research,models,pricing,enron,market,trading	312	
7	research,management,consulting,university,risk,derivatives,financial,mathematics,applied,analysis	217	
8	business,wharton,research,commerce,webi,new,internet,faculty,electronic,corporate	28	
9	risk,business,energy,management,performance,trading,real,time,data,issues	63	
10	real,options,www,cambridge,http,token-uri,university,conference,valuation,cam	235	
	Unclaimed List	0	

Communication Grid

Communication Grid									
View:		Sort:		TO:		FROM:		Domain Grid	
All Docs		Email Threads		Communication Grid		Domain Grid		Reports	
View:		Sort:		TO:		FROM:		Domain Grid	
Top 50		By Count		pete.davis<pete.davis@en...	1.75k	lesley.roper<lesley.roper@...	1.09k	lisa.muret<lisa.muret@ihg...	473
				<pallen@envion.com>	330				
				<pallen70@hotmail.com>	288	lesley.roper@ihg.com	286	"reneee.ardis (ihg)" <reneee.a...	234
				keith.holst	228	ina.rangel	224	"allen.phillip.k." <allen.phillip.k.all...	214
								<stagecoachmama@hotmail...	208
								christina.odubela <christin...	182
								lisa.muret@ihg.com	180
								mike.grigsby	176
								"muret,lisa (ihg)" <lisa.mur...	150
								undisclosed-recipients:	122
								scott.lorusso <scott.lorusso...	117
								susan.beadle <susan.bead...	117
								tamara.laster <tamara.last...	117
								"abi.okeeffe" <abi.okeeffe...	116
								frank.ermis	112
								caroline.horton <caroline.h...	102
								<cbpres@austin.rr.com>	101
								andrew.rubinacci <andrew...	98
								"es.foundationalrmh.servi...	90
								"jeff.smith" <jsmith@austin...	85
								rod.lindsey <rod.lindsey@i...	84
								<lesley.roper@ihg.com>	81
								john.j.lavorato	80
								matthew.lenhart	79
								bert.meyers <bert.meyers...	73
								ameresfoundation@mhse...	72
								angela.galejowski <angel...	66
								"amer.dsg.nhop" <amerdgs...	63
								"braesel.pamela.ihg" <pa...	62
								jeff.richter	62
								"es.foundationalrmh.servi...	50
								kacy.roseberry <kacy.roseb...	56
								"jarvis.alan.1(ihg)" <alan.j...	58
								<jsmith@austinintx.com>	56
								"amer.franchise.support.s...	54
								jennifer.norris <jennifer.nor...	51

GenAI for Investigations:

3 types



CAL

Document-level

Machine-learning review workflow that continuously improves document classification based on attorney feedback

Is this document relevant?

- Relevance
- Issue tagging
- Privilege & PII



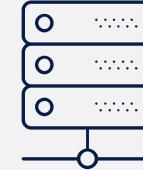
RAG

Corpus-wide

AI that grounds generated answers in retrieved, authoritative source documents

Is there evidence of X, Y, or Z?

- Analysis & strategy
- Issue spotting
- Timelines



LLM

Web-wide

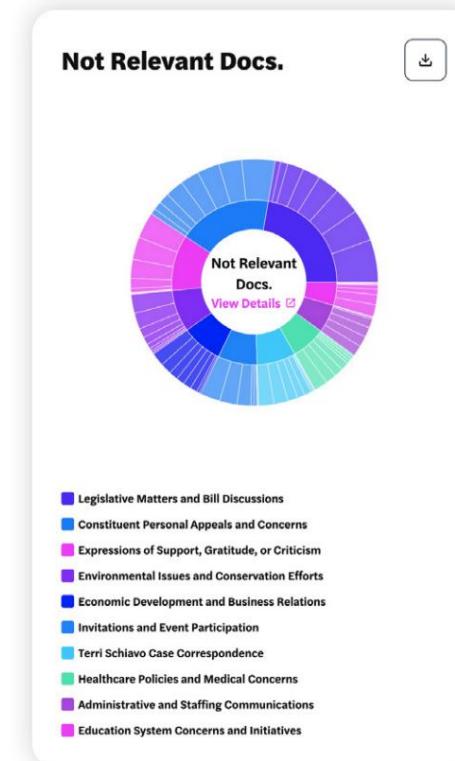
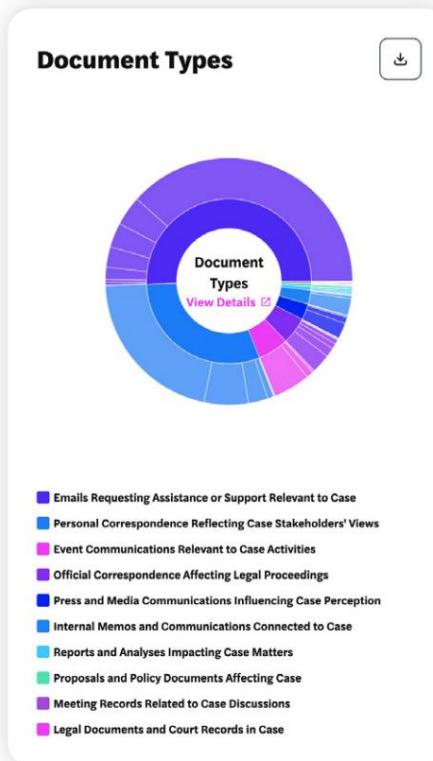
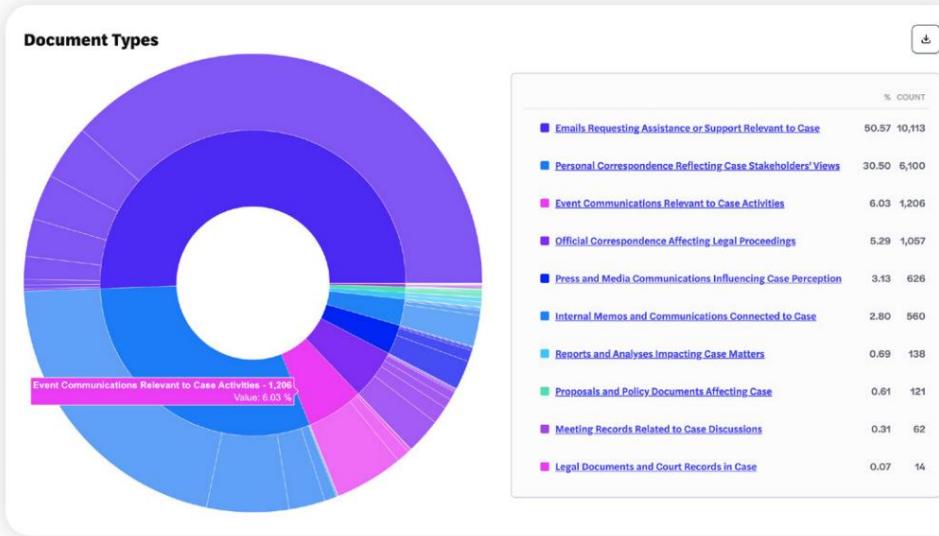
AI models trained on vast text data to generate, analyze, and summarize language

Can you summarize X? Is my logic flawed?

- Logic testing
- Summarization
- Drafting & editing

CAL

Continuous Active Learning



CAL

Continuous Active Learning

Narrative

TO: Senior Attorney / Partner
FROM: [Attorney Name], On Behalf of the Governor's Legal Team
DATE: [Current Date]
RE: Consolidated Analysis of Documents in the Elian González Litigation

I. INTRODUCTION AND CASE OVERVIEW

This memorandum offers a unified review of documents concerning Florida Governor Jeb Bush's position in the federal civil rights lawsuit arising from the seizure and repatriation of Elian González. Governor Bush, in conjunction with Cuban-American advocacy groups, immigration rights organizations, and several members of the U.S. Congress, challenges the federal government's handling of the matter under the Clinton Administration, alleging constitutional and statutory violations, as well as disregard for Florida's child welfare laws.

The core disputes involve:

- Whether federal authorities exceeded their jurisdiction by removing Elian from the U.S. without granting a state court hearing consistent with Florida's child welfare statutes.
- Whether due process rights were violated as a result of the rapid federal raid and absence of state-level judicial review.
- Whether political and diplomatic considerations related to U.S.-Cuba relations improperly affected the repatriation process.

Documents spanning email chains, memoranda, and internal communications illuminate the extent of Florida's attempted intervention and the resulting tensions with federal authorities. This memorandum integrates all relevant materials into a single comprehensive analysis, focusing on the major legal issues of jurisdiction, due process, child welfare obligations, and alleged federal overreach.

Key People

Jeb Bush

John Ellis "Jeb" Bush served as the 43rd Governor of Florida from January 1999–January 2007. He is the second son of former U.S. President George H. W. Bush and the brother of former President George W. Bush. Before becoming Governor, he was Florida's Secretary of Commerce (1987–1988) and a real-estate and commercial-development executive in Miami. As Governor, he oversaw all executive agencies in Florida, including the Department of Children & Families (DCF) and the Florida Department of Law Enforcement (FDLE). His public gubernatorial office address during the relevant period was The Capitol, 400 S. Monroe Street, Tallahassee, FL 32399; the main office telephone was (850) 488-7146. He communicated through an official email account (e.g., jeb@myflorida.com) that appears throughout the production (see JEB0000228595, JEB0000218910).

ROLE IN MATTER:

Governor Bush is a named defendant because the plaintiffs claim that federal authorities unlawfully ignored Florida child-welfare jurisdiction and that the Governor's statutory duties to protect Eilan González were obstructed. From November 1999 through June 2000:

- Because of those roles, Bush has first-hand knowledge of (1) all communications between Tallahassee and Washington, (2) the State's risk assessments and contingency planning, (3) the content of letters and press releases issued in his name, (4) directions given to FDLE, DCF, and outside counsel, and (5) assurances allegedly given by the White House and DOJ about the timing and manner of Eilan's removal.
- received and responded to INS correspondence acknowledging initial state-court jurisdiction (JEB0000218198, JEB0000218307);
- coordinated daily with FDLE Commissioner Tim Moore and counsel Carol Licko about legal filings, protests, and possible federal action (JEB0000218966, JEB0000228328);
- publicly insisted that a Florida dependency court, not INS, decide custody (JEB0000218711, JEB0000218804);
- exchanged phone calls and letters with President Clinton and AG Reno, protesting the prospect of

Key Events

1999-04-26 Tim Moore, head of the Florida Department of Law Enforcement, faxes an unofficial copy of an INS memorandum from Director Doris Meisner interpreting the Cuban Adjustment Act to Governor Bush's counsel, Carol Licko. (JBDM, TM, CAU)

1999-11-25 Six-year-old Eilan González is rescued off the Florida coast after the boat carrying him from Cuba capsizes. (EG)

1999-12-01 INS paroles Eilan to his Miami relatives and issues a press release saying custody will be decided in a Florida family court; the agency's letter is received by Governor Bush. (JB, EG, DM, CAU)

1999-12-10 Weekly update to Governor Bush notes continuing contacts with INS and immigration meetings in South Florida. (JEBAL)

1999-12-22 Governor Bush attends the CAMACOL holiday event in Miami amid Eilan-related demonstrations and media attention. (JEB, CAU, EG)

2000-01-05 Governor Bush publicly criticizes INS's change of course, asks Attorney General Janet Reno to overturn it, and supports a congressional effort to grant Eilan U.S. citizenship. (JB, IR)

Key Documents

1 JEB0000229583 Email from Tim Moore to Governor Jeb Bush: Law Enforcement Situation Update in Miami Regarding Eilan González. **Raid & Protests**

This document is an internal email sent by Tim Moore of the Florida Department of Law Enforcement to Governor Jeb Bush and senior staff on April 13, 2000. The email provides a real-time update on the evolving situation in Miami related to the Eilan González case. It describes the family's decision to return Eilan to the Little Havana home, their defiance of DOJ requests, and the rapidly escalating protest activity in the area. The email details law enforcement preparations, including the deployment of Metro-Dade Police and City Police, the readiness of over 250 state officers, and the establishment of a State Emergency Operations Center at FDLE Headquarters. It also notes DOJ plans to transfer Eilan with U.S. marshals and rumors regarding the involvement of Eilan's father. This document is highly relevant to the case as it provides contemporaneous evidence of the law enforcement response, the anticipated federal raid, and the tense atmosphere among the Cuban-American community. It supports arguments regarding the use of force, public unrest, and the coordination (or lack thereof) between state and federal authorities.

2 JEB0000228595 Statement of Governor Jeb Bush Regarding the Forcible Removal of Eilan González from His Miami Home (April 22, 2000). **Public & Media Relations**

This document is an email from Governor Jeb Bush responding to a constituent's criticism of his public stance on the Eilan González case. The email includes the full text of a press release issued by Governor Bush on April 22, 2000, following the federal raid that removed Eilan González from his Miami relatives' home. In the statement, Governor Bush expresses disappointment with the U.S. Justice Department's use of force, recounts assurances from President Clinton about a peaceful resolution, and emphasizes the importance of public safety and the rule of law. The document demonstrates Governor Bush's active engagement with the media and his criticism of federal actions, as well as his efforts to encourage mediation. This document is highly relevant to

RAG

Retrieval-Augmented Generation

Investigation relationship 

Question 1 2 +

15/05/2025 Joe Rayment
Did Daryl Maguire have a set of Gladys Berejiklian's house keys?

 Cicero Version 6-latest  Review Batch  B1 B2 > >|

Based on the source documents in this review batch, the relationship between Ms Berejiklian and Mr Maguire appears to have been a close personal one that involved Mr Maguire having a key to Ms Berejiklian's house. The documents provide the following key details:

1. Key access to Ms Berejiklian's house:
Multiple sources confirm that Mr Maguire had a key to Ms Berejiklian's house:

- Ms Berejiklian confirmed that Mr Maguire had a key to her current house, which was given to him soon after she moved in [3](#) .
- Mr Maguire also confirmed he had a key to Ms Berejiklian's house [4](#) .

2. Timeline of key possession:
The exact timeline is not entirely clear from the available documents, but:

- Mr Maguire estimated he was given the key around 2014/2015, though he was unable to recall the exact date [4](#) .
- According to one excerpt, Mr Maguire retained a key to Ms Berejiklian's house after 13 July 2018, despite her being advised not to have anything to do with him [1](#) .

3. Duration of key possession:
The documents suggest that Mr Maguire retained the key for an extended period:

- Ms Berejiklian did not ask for the key back and only changed the locks last year 2020 [3](#) .
- Mr Maguire stated that Ms Berejiklian never asked for the key back [4](#) .

4. Nature of the relationship:
The key appears to have been given in the context of a close personal relationship:

← Previous Batch Next Batch →

72.78 AI Units Investigation-Default Template    Create new task from documents

Source 5  71 

28102021_Operation Keppel transcript pp.2567-2615 from 10.00am to 1.03pm.pdf 10 Relevance 1 hr 5 mins read 

4 Pages 19-20 10 Relevance
Daryl Maguire confirmed he had a key to Ms Berejiklian's house and that she never asked for it back. He was unable to recall the exact date when he was given the key, but estimated it was around 2014/2015. The key was mentioned in the context of their close personal relationship, which involved staying together, holidaying together, and discussing marriage and having a child.

7 Pages 1-2 6 Relevance
Ms Callan makes an application for orders under section 31(9) and 112 of the ICAC Act due to personal privacy concerns regarding the close personal relationship between Mr. Maguire and Ms. Berejiklian. Counsel Assisting intends to adduce evidence about their relationship, including details that raise personal privacy concerns of the highest order for Ms. Berejiklian.

10112021_Operation Keppel transcript pp.2717-2802 from 9.00am to 1.00pm.pdf 8 Relevance 2 hr read 

Answer Analytics

5464 ingested pages
607 reactive pages
10 relevant pages

Document Review & AI



GenAI & Document Review

- Less training than TAR
- No need for agreed protocols(?)
- Higher Recall and Precision
- Cost concerns and a hybrid TAR model

Analytics & AI for eDiscovery

- Email threading
- Near-duplicate analysis
- Technology-Assisted Review (“TAR” or “Predictive Coding”)
- Privilege analytics
- Language analytics
- GenAI for document review

Defensibility & TAR 2.0.

“

“It is now black letter law that where the producing party wants to utilize TAR for document review, courts will permit it.”

– Magistrate Judge Peck,
Rio Tinto PLLC v. Vale S.A.
(S.D.N.Y. March 3, 2015)

”

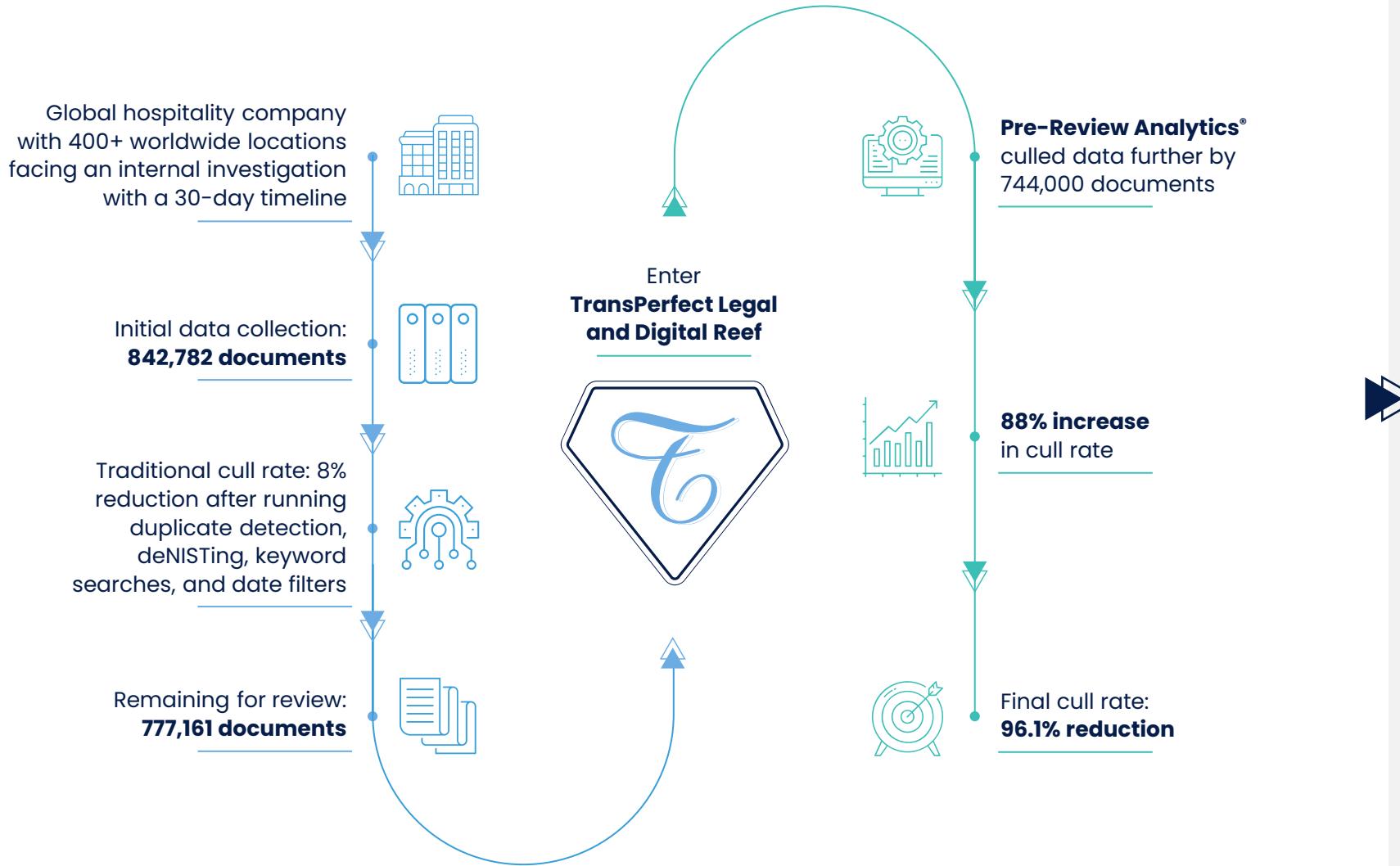
Review Sample Documents

Update Predictive Model



Case Study

Pre-Review Analytics® for an Internal Investigation



RESULTS

COST SAVINGS: \$624,960

- Average rate of 50 documents per hour charged at \$42 per hour for contract review attorneys

TIME SAVINGS: 14,880 HOURS

- With a team of 20 reviewers working 10 hours per day, review would have required 74 days

A Few Miscellanea



Ethics & AI

- Attorney obligations
 - When signing off on productions
 - When submitting to the Court
- Necessity of
 - Supervision
 - QC and validation
 - Understanding technology
- AI assists, but doesn't obviate accountability

LLMs & Everyday Practice

- Ideation
 - Pressure-test arguments
 - Refine logic
- Drafting & revisions
 - Spelling errors & nits
 - Usage errors
 - Language refinement
 - Tone adjustment
- Miscellaneous
 - News collator
 - Document summarizer
 - Upleveling



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