

JOSH STEIN
ATTORNEY GENERAL



**State of North Carolina
Department of Justice**

INVESTIGATIVE DEMAND

To: JUUL Labs, Inc.
560 20th Street
San Francisco, CA 94107

Serve on: Incorp Services, Inc., Registered Agent
176 Mine Lake Court, Suite 100
Raleigh, NC 27615-6417

TAKE NOTICE: YOU ARE HEREBY REQUIRED pursuant to N.C. Gen. Stat. § 75-9, to produce, on or before November 14, 2018, to the undersigned at the address below, the documents identified in this Investigative Demand.

PLEASE NOTE FURTHER that this Investigative Demand is ongoing in nature and that you should supplement your responses by delivering to the undersigned copies of responsive documents as those documents come into your possession, custody, or control, or as soon thereafter as practicable.

I. DEFINITIONS

1. **ALL** shall be construed to include the collective as well as the singular and shall mean “each,” “any,” and “every.”
2. **AND** and **OR** are terms of inclusion and not of exclusion and shall be construed either disjunctively or conjunctively, as necessary, to bring within the scope of this Civil Investigative Demand (“CID”) any document that might otherwise be construed to be outside of its scope.
3. **COMMUNICATIONS** mean and refer to any expression or exchange of information, either sending or receiving, by any means of transmissions, including but not limited to speech, writing, conduct, including in-person or telephone conversations, voice mails, letters, memoranda, facsimilies, e-mail, instant messages, text messages, postings or messages on “social networking” sites (including but not limited to Instagram, Snapchat, Facebook, Google+, and Twitter), shared applications from cell phones, or by any other means. **COMMUNICATIONS** shall also include, without limitation, ALL originals and copies of inquiries, discussion, conversation, correspondence, negotiations, agreement, understandings, meetings, notices, requests, responses, demands, complaints, press, publicity, or trade releases and the like that are provided by YOU or to YOU by others.
4. **CONCERNING** shall mean referring to, describing, offering evidence of, relating to, comprising, regarding, showing, or constituting.
5. **CORRESPONDENCE** includes all letters, emails, telephone calls, voice mails, emails, instant messages, social media postings or messaging, electronic message board posts, notices, advertisements, and other written communications, computerized communications or memoranda, and any records of conversations, meetings, conferences, or other oral communications.
6. **DOCUMENTS** means the original (or duplicate, identical copies when originals are not available), and any non-identical copies (whether different from the original because of notes made on such copies or otherwise) of writings or recordings of every kind and description whether written, mechanical, electronic or any other means, as well as phonic or visual reproductions of oral statements or conversations, and including, but not limited to, any manual, book, pamphlet, periodical, letter, group or individual e-mail, instant message, social media posting or messaging, electronic message board post, report, memorandum, notation, message, facsimile, record, study, working paper, accounting paper, telephone log, chart, graph, index, tape, minutes, computer printout, contract, lease, invoice, record of purchase or sale, correspondence, electronic or other transcription of taping of telephone or personal conversations or conferences, or any and all other written, printed, typed, taped, filmed or graphic matter however produced or reproduced and any electronic, mechanical, computer, e-mail, or Internet records or representations of any kind (including, without limitation, tapes, cassettes, discs, recordings, and computer and

electronic memories). **DOCUMENTS** includes the file, folder tabs or containers and labels associated with each original or copy. **DOCUMENTS** shall also include any **COMMUNICATIONS**.

7. **EMPLOYEE** means and includes, but is not limited to, all current or former salaried employees, hourly employees, independent contractors, and individuals performing work as temporary employees.
8. **IDENTIFY, IDENTIFYING, or IDENTIFICATION** shall mean (a) when used in reference to an individual: to provide his or her full name, present or last known residential and business addresses, present or last known telephone numbers and present or last known place of employment; (b) when used in reference to a business, firm, partnership, corporation, proprietorship, joint venture, association or entity: to provide its full name, present or last known address, telephone number and place of incorporation or formation; and the name of each agent that acted for it with respect to the matter relating to the request; and (c) when used in reference to a document: to state the date, title (if any), each author, each recipient, type of document (e.g., letter, invoice, etc.) or some other means of identifying it, and its present location and custodian.
9. **JUUL or YOU** shall mean and include JUUL Labs, Inc., a Delaware corporation with its principal place of business located at 660 Alabama Street in San Francisco, CA 94110, as well as any parent, affiliate, subsidiary or business segment, predecessor (including but not limited to PAX Labs, Inc., and Ploom, Inc.), successor or assignee of it, and its principals, operating divisions, present or former owners, EMPLOYEES, servants officers, directors, agents, representatives, attorneys, accountants, distributors, and any other PERSON acting on behalf of or under the direction, authorization or control of JUUL, including through any trade names or fictitious names.
10. **JUUL AFFILIATE** shall mean any PERSON that JUUL approved to be part of its JUUL Vapor e-Cig Affiliate Program.
11. **JUUL INTERNET RETAILER** shall mean any PERSON that sells JUUL products or JUUL compatible and/or superficially similar or identical products through an Internet website regardless of whether JUUL has or has not authorized them to sell such product online.
12. **PERSON** means any natural person, individual, any business entity (whether partnership, corporation, limited-liability company or corporation, trust estate, incorporated or unincorporated association or cooperation), any governmental agency or entity and any other legal or commercial entity, however organized.
13. **PRODUCT** shall mean any product, good or service that JUUL provides or has ever provided in North Carolina.

14. **RELATING TO** means in whole or in part constituting, concerning, evidencing, containing, discussing, commenting upon, describing, analyzing, identifying, stating, pertaining to, referring to, forming the basis of, in preparation of, or contradicting.
15. **TARGETED MARKETING** means the entire market JUUL sells or aspires to sell its PRODUCTS to, including a targeted set of customers for whom marketing efforts are directed.

References to the singular or plural form of any word shall be construed as inclusive of either form, as necessary, to bring within the scope of this CID any document or information that might otherwise be construed to be outside of its scope.

II. INSTRUCTIONS

1. **Relevant Time Period:** Unless otherwise noted, the relevant time period for which documents are requested is from January 1, 2015 to the present. In each instance in which a document is produced in response to a request, the current edition should be produced together with all earlier editions, or predecessor documents during the relevant time period, even though the title of earlier documents may differ from current versions.
2. **Authorship and Intended Audience Irrelevant:** This Investigative Demand requests production of all described documents in your possession, custody or control without regard to the person or persons by whom or for whom the documents were prepared (e.g., your employees, distributors, representatives, competitors, or others).
3. **Documents No Longer in Possession of Respondent/Destroyed Documents:** If any responsive document was, but no longer is, in your possession, custody or control, produce a description of each such document. The description shall include the following:
 - a. the name of each author, sender, creator, and initiator of such document;
 - b. the name of each recipient, addressee, or party for whom such document was intended;
 - c. the date the document was created;
 - d. the date(s) the document was in use;
 - e. a detailed description of the content of the document;
 - f. the reason it is no longer in your possession, custody or control; and
 - g. the document's current location.

If the document is no longer in existence, in addition to providing the information indicated above, state on whose instructions the document was destroyed or otherwise disposed of, and the date and manner of the disposal.

4. **Format of Responses:** Responses must be provided in an electronic format and produced in the manner specified in the “Protocol for Document Production” attached hereto as Appendix A.
5. **Privileged Documents:** If any responsive document is withheld under any claim of privilege, provide a detailed privilege log that contains at least the following information for each document that you have withheld:
 - a. the name of each author, writer, sender, creator, or initiator of such document;
 - b. the name of each recipient, addressee, or party for whom such document was intended;
 - c. the date of such document, or an estimate thereof if no date appears on the document;
 - d. the general subject matter of the document; and
 - e. the claimed grounds for withholding the document, including – but not limited to – the nature of any claimed privilege and grounds in support thereof.
6. **Duty to Supplement:** All document requests are continuing in nature so as to require the supplementary production if you obtain further responsive documents or information. You are also required to amend your responses to the requests contained within this subpoena if you discover that the previous response was incorrect or incomplete.
7. **Duty to Preserve Documents:** All documents and/or other data which relate to the subject matter or requests of this Investigative Demand must be preserved. Any destruction involving such documents must cease, even if it is your normal or routine course of business to delete or destroy such documents or data and even if you believe such documents or data are privileged or otherwise need not be produced. Electronically-stored information is an irreplaceable source of evidence in this matter. Accordingly, you must also implement appropriate safeguard against the destruction of electronically stored information that relate to the subject matter or requests of this Investigative Demand until the final resolution of this issue.

III. DOCUMENTS REQUESTED

1. ALL COMMUNICATIONS, CORRESPONDENCE, or other DOCUMENTS CONCERNING any advertisements, promotional materials, and/or marketing campaigns for JUUL PRODUCTS or JUUL-compatible PRODUCTS in North Carolina, including but not limited to ALL print advertisements and/or marketing conducted online, via SMS/MMS or other messaging services, on digital platforms, social media platforms or “social networking” sites such as Instagram, Snapchat, Twitter, Facebook, Google+, etc.
2. ALL DOCUMENTS concerning YOUR representations or statements about the safety of JUUL PRODUCTS, JUUL-compatible PRODUCTS, or e-cigarette PRODUCTS generally, including any disclosures, warnings, notices, alerts, admissions, notifications or announcements JUUL has made to customers, the public, the media, the Food and Drug Administration, or other persons or entities.
3. ALL COMMUNICATIONS, CORRESPONDENCE, or other DOCUMENTS RELATING TO product placement of JUUL PRODUCTS at wholesaler or retailer locations in North Carolina.
4. IDENTIFY the locations of each brick-and-mortar wholesaler or retailer that sells, distributes, or promotes JUUL PRODUCTS in North Carolina, and how these locations are targeted and determined.
5. All contracts or agreements between JUUL and: (a) any brick-and-mortar wholesaler or retailer in North Carolina that sells, distributes, or promotes JUUL PRODUCTS; (b) any other JUUL AFFILIATE or JUUL INTERNET RETAILER or other entity that sells, distributes, or promotes JUUL PRODUCTS to North Carolina residents.
6. ALL DOCUMENTS RELATING TO the research, analysis and evaluation of JUUL’s advertising strategies, promotional materials, and/or TARGETED MARKETING, including but not limited to focus groups, consumer surveys, and third party research concerning product design, packaging, and names assigned to JUUL PRODUCTS, as well as any research, analysis, and evaluation of JUUL’s advertising strategies, promotional materials, or TARGETED MARKETING pertaining to any specific age demographic.
7. ALL DOCUMENTS RELATED TO flavorings used in JUUL or JUUL-compatible liquid nicotine inserts other than “tobacco” and “menthol” that JUUL currently manufactures, sells and/or distributes, has ever manufactured, sold and/or distributed, and has ever contemplated manufacturing, selling and/or distributing in the past or in the future, including the names contemplated for each flavoring or flavor-combination.
8. ALL DOCUMENTS RELATING TO JUUL’s decision to use a nicotine concentration of 59mg per ml (5% strength) in YOUR PRODUCTS or JUUL-compatible PRODUCTS, including any PRODUCT warnings considered or actually placed on PRODUCT packaging relating to nicotine concentration.

9. ALL COMMUNICATIONS, CORRESPONDENCE, or other DOCUMENTS, including studies, reports, memoranda, or emails, whether internal or external, RELATING TO the safety of JUUL PRODUCTS and any JUUL-compatible PRODUCTS.
10. ALL COMMUNICATIONS, CORRESPONDENCE, or other DOCUMENTS, including studies, reports, memoranda, or emails, whether internal or external, RELATING TO the efficacy of JUUL PRODUCTS with respect to YOUR representations that JUUL e-cigarette devices:
 - a. Are a smoking cessation PRODUCT, including YOUR claim that 500,000 smokers have successfully switched from using traditional tobacco cigarettes in favor of JUUL PRODUCTS;
 - b. Produce minimal byproduct;
 - c. Are easier to use than traditional cigarettes;
 - d. Are a safer alternative to traditional tobacco/combustible cigarettes.
11. ALL COMMUNICATIONS, CORRESPONDENCE, or other DOCUMENTS that reflect, discuss, or show: (a) the total number of individuals in North Carolina who buy or use JUUL PRODUCTS or JUUL-compatible PRODUCTS; and (2) the number of individuals in North Carolina under the age of 18 who buy or use JUUL PRODUCTS or JUUL-compatible PRODUCTS.
12. ALL COMMUNICATIONS, CORRESPONDENCE, or other DOCUMENTS CONCERNING: (a) any policy, procedures, or protocols JUUL has developed and implemented to audit, examine, and/or test, the effectiveness of its age verification system on its website for purchasing JUUL PRODUCTS; (b) the results of any audit, examination, and/or test of the effectiveness of such age verification system; (c) any changes JUUL made to its website purchasing system because of the results of any such audit, examination, and/or test.
13. IDENTIFY ALL third-party vendors YOU have contracted with or used to perform age verification services on your ecommerce platform, as referenced on JUUL's website.
14. ALL COMMUNICATIONS, CORRESPONDENCE, or other DOCUMENTS CONCERNING (a) any policy, procedures, or protocols JUUL has developed and implemented that require JUUL AFFILIATES or JUUL INTERNET RETAILERS to verify the age of the purchasers of JUUL PRODUCTS or JUUL-compatible PRODUCTS; (b) any failure by any JUUL AFFILIATE or JUUL INTERNET RETAILER to include or implement a system to verify the age of purchasers; (c) any failure by any JUUL AFFILIATE or JUUL INTERNET RETAILER to verify the age of purchasers, or not comply in any way with N.C. Gen. Stat. § 14-313(b2).
15. ALL COMMUNICATIONS, CORRESPONDENCE, or other DOCUMENTS CONCERNING any policy, procedures, or protocols JUUL has developed and

implemented to search and examine the Internet for websites that sell JUUL PRODUCTS or JUUL-compatible PRODUCTS, including how YOU track or monitor bulk online sales, including but not limited to documents reflecting how YOU “actively monitor the internet and process thousands of enforcement actions per month”, as stated on JUUL’s website at <https://www.juul.com/youth-education-awareness-and-prevention>.

16. ALL COMMUNICATIONS, CORRESPONDENCE, or other DOCUMENTS CONCERNING any audit of social media platforms or “social networking” sites such as Instagram, Snapchat, Twitter, Facebook, Google+, etc. to remove posts, pages and unauthorized offers to sell JUUL PRODUCTS targeted at underage accounts. In your response, IDENTIFY ALL posts or pages targeted at, created by, or promoted by underage accounts that JUUL has discovered, designating when and where they were found and whether they have been removed.
17. ALL COMMUNICATIONS, CORRESPONDENCE, or other DOCUMENTS CONCERNING the sale, distribution, or promotion of JUUL PRODUCTS or JUUL-compatible PRODUCTS and:
 - a. Direct Eliquid LLC, directeliquid.com, and/or buyjuul.com
 - b. Electric Tobacconist LLC and/or <https://www.electrictobacconist.com/juul-m54>
 - c. Drizly and/or <https://drizly.com/extras-brands/juul/b12908>
 - d. 7Plug and/or <https://7plug.com/>
 - e. Kit Juul and/or <https://www.kitjuul.com/>
 - f. eBay and/or www.ebay.com/juul
 - g. Vape Shack and/or <https://www.vapeshack.com/juul>
 - h. Price Point NY and/or <https://pricepointny.com/collections/juul>
 - i. Juno Monster and/or <https://junomonster.com/>
 - j. Eonsmoke, LLC and/or eonsmoke.com
18. ALL COMMUNICATIONS, CORRESPONDENCE, or other DOCUMENTS CONCERNING JUUL’s “reseller terms that include monitoring and penalties for noncompliance with underage restrictions”, as stated on JUUL’s website at <https://www.juul.com/youth-education-awareness-and-prevention>.
19. ALL COMMUNICATIONS, CORRESPONDENCE, or other DOCUMENTS CONCERNING JUUL’s “random compliance checks of independent retail stores using our secret shopper program” in North Carolina, as stated on JUUL’s website at <https://www.juul.com/youth-education-awareness-and-prevention>.
20. ALL COMMUNICATIONS with retailers RELATING TO potential or confirmed purchases of JUUL PRODUCTS by individuals under the age of 18 in North Carolina.
21. ALL COMMUNICATIONS, CORRESPONDENCE, or other DOCUMENTS CONCERNING complaints made by North Carolina consumers about JUUL, JUUL PRODUCTS, or JUUL-compatible PRODUCTS sold or purchased on JUUL’s website or

any other website, including but not limited to any JUUL AFFILIATE or JUUL INTERNET RETAILER.


22. ALL DOCUMENTS, whether created by YOU or a third-party, RELATING TO an evaluation of YOUR policies, procedures, and protocols (whether formal or informal) for handling complaints or notices of potential or confirmed purchases of JUUL PRODUCTS or JUUL-compatible PRODUCTS by individuals under the age of 18, and/or evaluating YOUR compliance with N.C. Gen. Stat. § 14-313(b2).
23. ALL COMMUNICATIONS, CORRESPONDENCE, or other DOCUMENTS RELATING TO the programs and initiatives described on JUUL's website at juul.com/youth-education-awareness-and-prevention, including ALL DOCUMENTS that:
 - a. Describe these education programs in detail;
 - b. Concern the development and creation of these education programs;
 - c. Were relied upon in the development and creation of these education programs;
 - d. Concern partnering with any PERSONS in development and creation of these education programs, including ALL COMMUNICATIONS and CORRESPONDENCE with those PERSONS;
 - e. Concern ALL suggestions, proposals, and/or ideas from any law enforcement agency, school district, school, teacher, parent, student, faith-based organization, and/or substance abuse program provided to JUUL to reduce the likelihood that any person under the age of 18 would use a JUUL PRODUCT or JUUL-compatible PRODUCTS;
 - f. Reflect any policy, procedure, or protocol JUUL developed and implemented resulting from any of the suggestions, proposals, and/or ideas IDENTIFIED in response to Request #23.e;
 - g. Concern COMMUNICATION with any North Carolina law enforcement agency, school district, school, teacher, parent, student, faith-based organization, and/or substance abuse program regarding adopting, excepting, or using these education programs.
24. ALL COMMUNICATIONS, CORRESPONDENCE, or other DOCUMENTS RELATING TO the statement on JUUL's website at juul.com/youth-education-awareness-and-prevention that it "pledged an initial investment of \$30M over the next three years dedicated to independent research, youth and parent education, and community engagement," that:
 - a. Describe this research, education, and engagement in detail;
 - b. Concern the development and creation of this research, education, and engagement;
 - c. Were relied upon in the development and creation of this research, education, and engagement;

- d. Concern partnering with any PERSONS in developing this research, education, and engagement, including ALL COMMUNICATIONS and CORRESPONDENCE with those PERSONS; and
- e. Concern the source and expenditure of the \$30 million dedicated to this research, education, and engagement.

25. DOCUMENTS sufficient to identify ALL investigations conducted by any local, state, tribal, federal, or international governmental entity, or lawsuits filed by any PERSON or entity RELATING TO the sale and/or distribution of JUUL PRODUCTS to individuals under the age of 18, and ALL settlements or dispositive orders concluding such investigations and lawsuits.

Issued October 15, 2018 under my hand and seal pursuant to authority vested in me by Sections 75-9 and 75-10 of the General Statutes of North Carolina.

JOSHUA H. STEIN
Attorney General

By: 

Laura H. McHenry
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Consumer Protection Division
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Appendix A

Protocol for Document Production

Documents shall be produced according to the following formats:

a. Electronic Production of Paper Documents.

Documents that are maintained in paper format shall be scanned as black and white images at 300 x 300 d.p.i. or greater resolution, in single-page Group 4 compressed TIFF images and reflect the full and complete information contained in the original Document. Documents shall also be produced with the associated OCR, and with a load file, in accordance with b(viii).

b. Electronically Produced or Stored Material.

- i. All document data in electronic format must be scanned and confirmed free of computer viruses and provided with passwords necessary to access them.
- ii. Produce documents in the order in which you maintained them in your files, in copies of their original file folders, labeled with the folder's original file labels.
- iii. All attachments to responsive documents shall be produced attached to the responsive documents.
- iv. Provide a key to all abbreviations used in the documents and attach the key to the appropriate documents.
- v. No portion of any document shall be masked and the entire document shall be produced.
- vi. If a document is responsive to more than one request, it shall be clearly marked to so indicate.
- vii. Indicate the Request(s) to which each document or answer responds in a metadata field titled "RequestNo."
- viii. Documents produced electronically and electronically stored information shall be produced in accordance with the following instructions:
 1. **Image Files:** Any documents produced in response to this Request should be provided as a multi-page PDF file with embedded text and 8.5 x 11 inch page size that reflects how the source document would have appeared if printed, and which are named for the Bates number of first page of the document.
 2. **Text Files:** Document level text files containing extracted text or OCR should be provided for each document produced and named for the Bates number of first page of the document. To the extent that extracted text does not exist, the images should be run through Optical Character Recognition (OCR) so that they are fully searchable.
 3. **Load Files:** Load files shall be produced with each production of documents with extracted metadata for each document (objective coding) included in the load file. The data file shall include the fields and type of content set forth below. Objective coding shall be labeled

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and produced on Production Media in accordance with the provisions set forth above.

- a. The data load file should contain all of the metadata fields (both system and application—see list below) from the original Native documents with an extension .CSV, .TXT, or .DAT for loading into the review platform.
 - b. The load file of extracted metadata should be delimited with ASCII 020 for the comma character and ASCII 254 for the quote character. All values in a multi-value field shall be separated by a semi-colon ASCII 059. The use of commas and quotes as delimiters is not acceptable.
 - c. The header row for the load files should contain the metadata field names which are listed below.
 - d. The image load file should contain an extension .OPT or .LFP.
4. **Document Unitization:** The boundaries of a document shall be based upon the smallest physical binding (*i.e.*, staple, paper clip, binder clip, etc.) associated with that document. In the event there is a series of loose pages that have no small physical bindings, the document boundary shall be based upon the largest physical binding (*i.e.*, folder, redwell, binder, etc.). The boundaries of the parent/child attachment relationship shall be based upon the largest physical binding (*i.e.*, binder clip, folder, redwell, etc.) associated with that family of documents. The document boundaries and corresponding parent/attachment relationships shall be provided in the load files furnished with each production.
5. **Bates Numbering:** Each page of a produced document shall have a legible, unique page identifier (Bates number) electronically branded onto the image at a location that does not obliterate, conceal, or interfere with any information from the source document. In order to ensure that the Bates numbers do not obscure portions of the documents, the images may be proportionally reduced to create a larger margin in which the Bates number may be branded. There shall be no other legend or stamp placed on the document image, except those sections of a document that are redacted to eliminate material protected from disclosure by the attorney-client or work product privileges shall have the legend “REDACTED” placed in the location where the redaction(s) occurred or shall otherwise note the location and/or location of the information for which such protections are claimed. If you have previously produced documents, begin the Bates number for subsequent productions with the Bates number following the Bates number of the last document page produced.
6. **File Naming Conventions:** Each PDF file shall be named with the unique Bates Number on the first page of the multi-page PDF file ending with a “.PDF” extension. Each document shall be named with

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a unique document identifier. Attachments shall have their own unique document identifiers.

7. **Production Media:** All documents should be produced on CD-ROM, DVD, or external hard drive with standard Windows PC compatible interface (the production media). Each piece of production media shall identify a production volume number corresponding to the production “wave” the documents on the production media are associated with (e.g., “V001,” “V002”), as well as the volume of the material in that production wave (e.g., “-001,” “-002”). For example, if the first production wave comprises document images on three hard drives, each hard drive shall be labeled in the following manner: “V001-001,” “V001-002,” and “V001-003.” Additional information shall be identified on the physical production media including: (i) text referencing that it was produced in [Case Docket No.], (ii) the producing party’s name, (iii) the production date, and (iv) the Bates number range of the documents contained on the production media.
8. **Native Format for Excel and Access Databases:** To the extent that requested documents exist in Excel or another spreadsheet program, produce the document in its native format. To the extent that the document format constitutes a database created or maintained in Access or another software program, produce the document in its native format. If the database is based upon proprietary software, produce whatever keys and instructions are necessary to review it. A single page PDF image placeholder should be provided for each document provided in native format. Each PDF placeholder shall contain the phrase “DOCUMENT PRODUCED IN NATIVE FORMAT” and contain the Bates number corresponding to the native file.
9. **PowerPoint Presentations:** Presentations should be produced in full slide image format along with speaker notes (which should follow the full images of the slides) with related searchable text, metadata, and bibliographic information. Presentations should also be produced in native format (e.g., as .PPT files). The linked native file name should also match the BegDoc with the appropriate file extension.
10. **Audio and Video Data:** These specifications do not address the production of audio/video data. Care must be taken to ensure that all responsive audio and video data and their metadata are preserved. These data types may be stored in audio or video recordings, voicemail text messaging, and related/similar technologies.
11. **Production Exception Handling:** Any documents produced which cannot be converted to a PDF image due to a processing error must be reported along with the corresponding Bates number. Once an exception report for production is received, counsel for the State may request to see the native file for that exception.

Appendix A

ix. Hard copies of documents to be produced in response to this Request shall be produced in the following electronic format:

1. Create electronic copies of the documents and produce them in accordance with the procedures described below, provided that you retain the originals from which the electronic copies were made until the final disposition of the matter;
2. Include a load file with corresponding information, including the following data fields: BegDoc, EndDoc, Custodian, DocTitle, Filename, and Request No.;
3. The Custodian field in the load file should contain the identity of the custodian or location from which the hard copy document was taken; and
4. The Request No. field should contain the number of the Request(s) to which the document is responsive.

x. For all documents produced, provide the following metadata fields:

REQUIRED METADATA FIELDS	
FIELD NAME	FIELD DESCRIPTION
BEGDOC	Beginning Bates number (production number)
ENDDOC	End Bates number (production number)
BEGATTACH	First Bates number of family range (<i>i.e.</i> , Bates number of the first page)
ENDATTACH	Last Bates number of family range (<i>i.e.</i> , Bates number of the last page of the last attachment)
ATTCOUNT	Number of attachments to an email
ATTACH	Populate parent records with original filenames of all attached records, separated by semi-colons
CUSTODIAN	Name of person from whose files the document is produced
AUTHOR	Author of the e-doc or attachment
RECIPIENTS	Recipients of e-doc
FROM	Sender of email
TO	Recipient of email
CC	Additional recipients of email
BCC	Blind additional recipients of email
FILESIZE	Size of the file
PGCOUNT	Number of pages in the e-doc
DATERECD	(mm/dd/yyyy) Date email was received
TIMERECD	Time email was received
DATESENT	(mm/dd/yyyy) Date sent
TIMESENT	Time sent
CRTDATE	(mm/dd/yyyy) Date created

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CRTTIME	Time created
LASTMODDATE	(mm/dd/yyyy) Date last modified
LASTMODTIME	Time last modified
TITLE	Title field value extracted from the metadata of the native file
MODBY	Name of person(s) who modified e-doc
SUBJECT	The value in the subject field of an e-doc or e-attachment
FILENAME	The full name of the native file
FILE EXT	The extension of the file
MD5HASH	MD5 Hash Value created during processing
FULLPATH	File source path for all electronically collected documents, which includes location, folder name, file name, and file source extension
RECORDTYPE	Should contain the value of email, e-doc or e-attachment
APPLICATION	Name of the application used to open the file
VOLUME	Production volume number (e.g., V001, V002 etc.)
COMMENT	Values extracted from comments metadata field
ENTRYID	Unique identifier of emails in mail stores
ATTLIST	List of each attribute on a previous defined element definition within a DTD
FAMILYDATE	(mm/dd/yyyy) Date value of parent file (email or e-doc)
REQUESTNO	Multi-entry field
NATIVELINK	The full path to the produced native on the production deliverable
TEXTPATH	The full path to the produced text files on the production deliverable