

## Draft Commentary on Discovery of Collaboration Platforms

### Discussion Topics

1. The Drafting Team—with representation of a diverse set of interests including prominent thought leaders on both sides of the “v.”—has reached consensus on the draft Commentary. Do WG1 members believe that there are any issues in the draft that should be included, excluded, or handled differently before the draft Commentary goes out for public comment?
2. The draft Commentary focuses on practical guidance regarding identifying and addressing issues and challenges related to preservation, collection, production and overall discovery of communication and collaboration platforms, recognizing that the technology related to these issues is fluid and will develop over time. Is there any practical guidance that you believe is missing or should be added to the draft Commentary?
3. The Drafting Team has reviewed and considered the comments and ideas expressed at and following the WG1 mid-year and annual meetings. The Team has considered them carefully and has incorporated the ideas consistent with the entire Team’s judgment. Do WG1 members believe that there any comments that have not been incorporated that you believe should be?
4. Discovery of communication and collaboration platform data and related issues such as hyperlinks is quickly becoming a significant issue in most litigation. The Drafting Team believes the guidance in the draft Commentary will assist parties and courts in identifying issues and addressing issues that arise from these modern discovery sources. Do WG1 members agree that this is the time that Sedona be addressing these issues?