

# Two-step Test Emerges for Recovering E-Discovery Costs in the 7th Circuit

[Matthew C. Luzadder](#)

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This article discusses the recovery of e-discovery expenses in the context of the Federal Rules of Civil Procedure (FRCP) and the law of the 7th U.S. Circuit Court of Appeals. It reviews the 7th Circuit's two-step test, under applicable recent case decisions. First, the court determines if the e-discovery costs are recoverable. Second, the court must determine the amount of any recoverable costs. It also provides important lessons, factual examples underscoring the need for detailed billing records documentation of costs.