E-DISCOVERY QUESTION CHECKLIST

Business Clients

Individuals

Business Email

- [ ] Does your business have its own email server or is your email system cloud-based?
- [ ] Do you have an auto-delete or auto-archive policy?
- [ ] Have there been any changes in your email system since the beginning of the events underlying the case?
- [ ] Have you taken any steps already to save or preserve emails related to the events in this case?
- [ ] Do you know if any of the emails related to this case have been lost? If so, how?

IT Personnel

- [ ] Who handles IT at your business? Do you have someone onsite or do you contract with a vendor?

Business Databases

- [ ] What do you use for payroll? Can payroll records be exported to CSV format?
- [ ] What software do your employees use at work?

Mobile Devices

- [ ] Do employees use smartphones as part of their work?
- [ ] Are mobile devices issued by your business or do employees use their own devices?

Voice Communications

- [ ] Does your business use a VOIP system for phones?
- [ ] Can voice messages and call logs be downloaded?

Surveillance Equipment

- [ ] What specific surveillance equipment do you use?
- [ ] Where is this data stored? Are there backups?
- [ ] Have there been any changes in these systems since the events started that led up to the lawsuit?
- [ ] Do you monitor employees' computer usage?

File Systems

- [ ] Do employees use company-issued computers?
- [ ] Do employees store files on a network drive or a cloud storage system like Box.com or Dropbox?
- [ ] Where are backup files from the hard drives of individual employee computers located?
- [ ] Where are paper documents stored?
- [ ] Are paper documents scanned?

Personal Email

- [ ] How many email accounts do you have?
- [ ] What are all of your email addresses? How do you use each account? Are any of these accounts shared?
- [ ] Have any of these accounts been hacked or compromised at any time?

Mobile Devices

- [ ] Do you own an iPhone or other smartphone? Do you own an iPad or other tablet device? Do you own a smart watch of any kind?
- [ ] What is the manufacturer, model, serial number, date acquired, and typical use case for each such device you've owned since the beginning of the events leading up to this case?
- [ ] Have you owned any devices during these periods that have been damaged or lost? What happened?
- [ ] Do you have any SMS messages related to the events of the lawsuit?
- [ ] Which phone company do you use? Do you have your recent phone bills?

Social Media and Apps

- [ ] Which sites do you use primarily? How and why do you use each one? What is your public username/account name on each site?
- [ ] Do you have privacy settings on these sites?
- [ ] What apps do you use most often on your phone?
- [ ] Do you have any fitness tracking apps?

Computers

- [ ] Do you own any laptop or desktop computers? Where are they? What is the make and model for each?
- [ ] How do you use these computers? Do you share them with anyone?
- [ ] Do you use Google Drive or Dropbox for saving files?
- [ ] Do you use any other cloud-based services?

Paper Documents

- [ ] Have you collected paper documents related to the case? Where do you keep these documents?
- [ ] Where do you keep documents like bank statements, medical records, and phone bills?