

MAY 16, 2024

Leveraging Tech Tools to Treat Your Legal Pain Points

Association of Corporate Counsel – Charlotte

Leveraging Tech Tools to Treat Your Legal Pain Points: In law school, we're taught how to use our brains to handle whatever legal issues we might encounter but we are not taught how to employ technology as we navigate those legal issues. In this CLE, we will bridge this gap by exploring six real-world organizational pain points and demonstrate how tailored technology and innovative workflows can enhance your legal practice. Attendees will learn how automating repetitive tasks, streamlining processes, and reducing risks can not only enhance efficiency but also allow you as legal professionals to focus on more complex legal matters.

Agenda

Duty of Technology Competence

Pain Point #1 – Managing Volume Loan Review

Pain Point #2 – Identifying PII and Individuals Affected by Data Breaches

Pain Point #3 – Identifying and Tracking Legislation That May Affect Business

Pain Point #4 – Identifying and Collecting Data from Incongruous Databases

Pain Point #5 – Tracking Bad Actors Committing Fraud to Harm Business

Pain Point #6 – Tracking Customer Complaints for Witnesses and Experts

Pain Point #7 – Volume Notices of Dispute and Arbitrations

The Rise of Generative AI in E-Discovery

Questions

Duty of Technology Competence

01



27 N.C.A.C. Chapter 1D – Section .1518

- a) Annual Requirement. Each active member subject to these rules shall complete 12 hours of approved continuing legal education during each calendar year...

Of the 12 hours**:

- (2) at least 1 hour shall be devoted to technology training

Technology Training means an education on an information technology product, device, platform, application or other tool, process or methodology.

**Note that on March 1, 2024, annual CLE requirements changed, but 1 hour of Technology Training is still included in NC requirements.



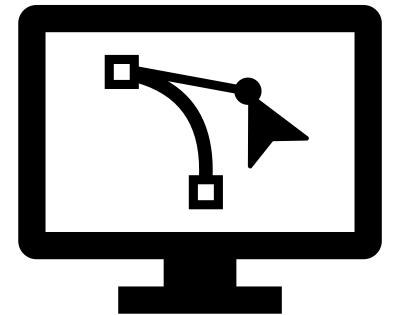
Technology Training Mandate

NC was the 2nd state to mandate tech training.

- This mandate is in response to Comment 8 of NC RPC Rule 1.1.
- State Bar recognized that the legal landscape is continuously changing, and attorneys should be versed on how new technology can assist in the practice of law to the benefit of the general public.

Purpose of the mandate:

- Requires attorneys to be aware of the technological tools that are available to improve the practice of law.
- Aligns attorney competence with the understanding and use of the available technological tools.
- Ensures attorneys recognize that the use of these tools is a necessity in today's practice of law.



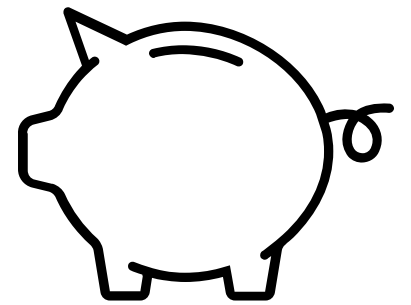
Pain Point #1 – Managing Volume Loan Review

02



Pain Point #1:

- Client in the financial services industry has steady volume of delinquent loans and is expecting the volume to rise over the next year.
- Client utilized both internal and external legal resources to review, manage and collect on delinquent loans but the process was replete with inefficiencies.
 - Client did not have central repository of standardized templates and preferred standard operating procedures. As a result, legal strategies and work product were inconsistent across regions and duplicative work was commonplace.
 - Client wanted to reduce costs and simplify pricing from hourly to fixed fee for pre-litigation stages of the process.
 - Client needed comprehensive, real-time reporting on all loans and billing.



Tech Solution: Customized Tracking and Resource Management Tool

Utilize a dynamic, searchable data management tool like **Relativity** to provide the framework for organization of materials and information. With Relativity:

- Central repository of templates, organized by jurisdiction and region, and preferred standard operating procedures, available for outside counsel, local counsel and client.
- House all loan documents, including external law firm assignment forms, existing collateral loan file, credit approval documents and all other related records.
- Customize database for intake and analysis; auto-populate fields with borrower information.
- Create customized, real-time tracking and comprehensive reporting on data points that are important to the client – on each loan, across specific jurisdictions/regions and across all loans.

Team of dedicated, highly-trained but low-cost legal resources, such as contract attorneys, handle legal tasks at fixed rate.

How Does the Process Work?

File received from client is processed into Relativity, made searchable and borrower/loan information is extracted

Contract attorney reviews loan documents and extracted information and inserts analysis into fields in Relativity

Contract attorney prepares demand/default/reservation of rights letter (and any other fixed fee work)

Relativity synthesizes information and status into customized tracking and reporting available in real-time for client

In coordination with loan officer and outside counsel, contract attorney escalates for next stage



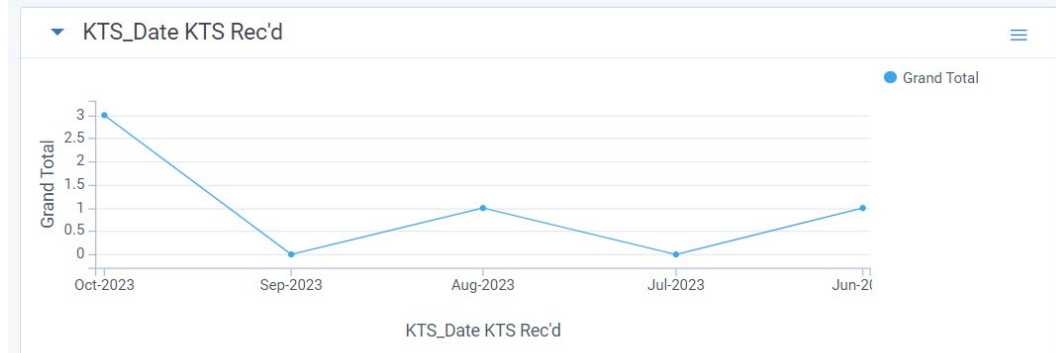
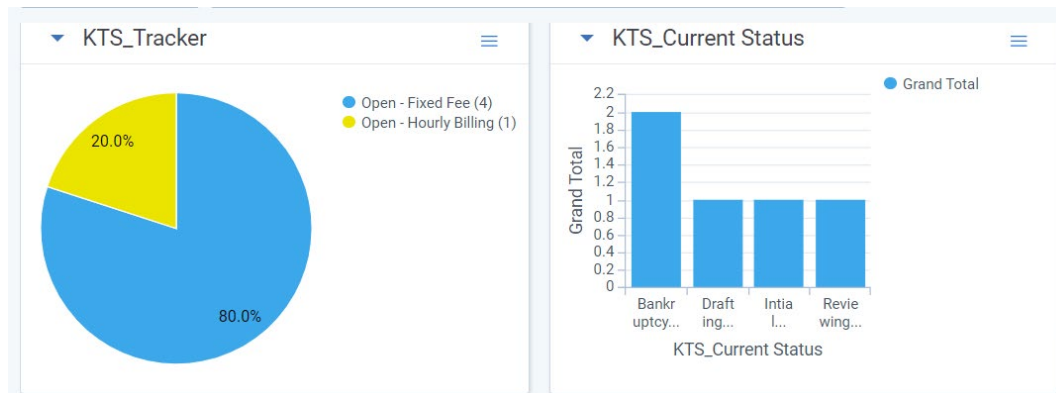
Database Organization and Reporting

Kilpatrick Confidential

Bank Loan Workspace

Filter

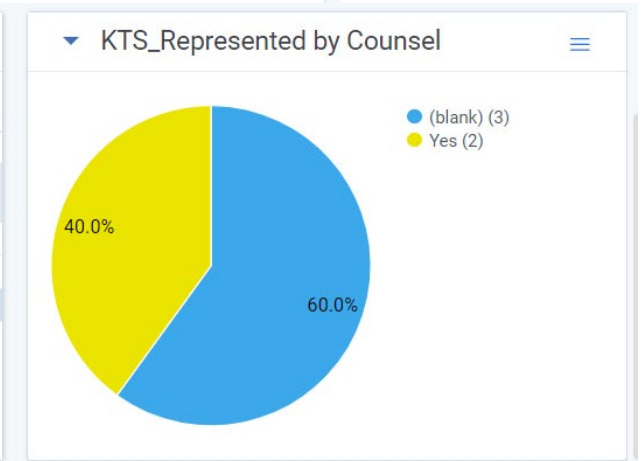
- Bank Loan Workspace
 - _Admin
 - 001 Trackers
 - 1. Open Tracker
 - 2. Closed Tracker
 - 3. Open + Closed Tracker
 - 002 Client Reporting
 - Client Master Report
 - 003 Workflows
 - Checklist + Billing
 - Checklist / Billing Tracking
 - Conflicts
 - Conflicts Check Needed
 - 004 Document Bank
 - Document Bank
 - 005 Team Member Searches
 - Blackout Searches



KTS_Date Complaint Filed

1 - 2 of 2

KTS_Date Complaint Filed	Grand Total
(All)	5
Jul-2023	1
(blank)	4
Grand Total	5



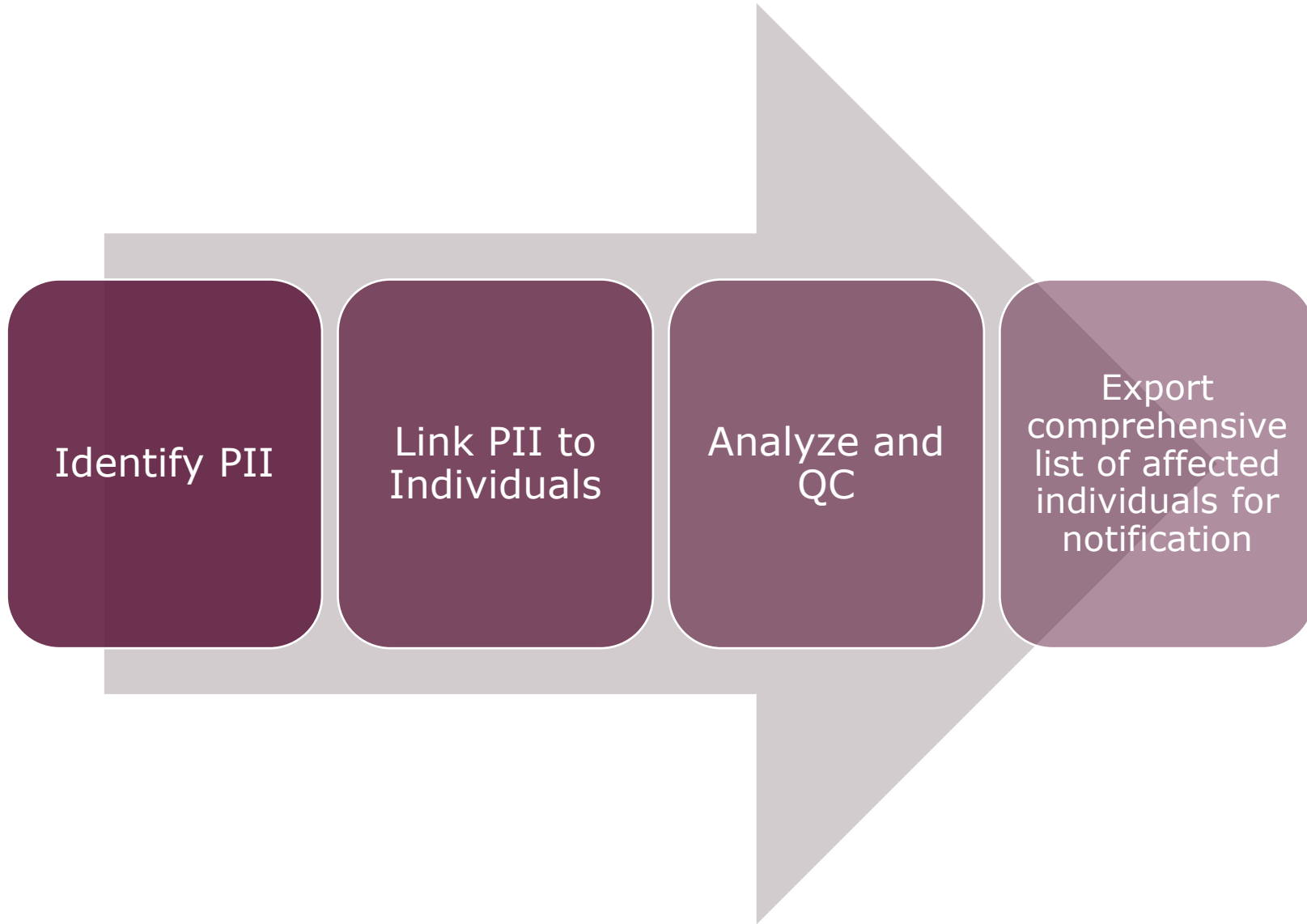
Pain Point #2 – Identifying PII and Individuals Affected by Data Breaches

03



Pain Point #2

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4M+
Records

500,000+
Instances
of PII

20,000+
Individuals
Affected



Responding to Data Breaches

01

Scan Data and Prepare for Analysis

Data potentially involved in the breach is scanned for viruses and malware on isolated machines (“DMZ Machines”), not connected to any company network.

Data is then processed into a tool like Relativity to remove duplicates and make the data searchable and useable.

02

Bucket Data

Categorize data into buckets (by file type or source) – one that is likely to contain PII and one that is not.

Data that exists in databases, tables or spreadsheets may be more likely to contain PII than other data. Prioritize this data for analysis.

03

Identify PII and Individuals Subject to Breach

Using AI and machine learning, automate identification of SSNs and other PII with targeted searches.

Link identified PII to individuals subject to breach.

The initial linking is currently manual. However, each time a linked individual’s PII appears in a document, it will link automatically to that individual.



Identification and Capture of PII

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REL0000000023

Viewer | Extracted Text | Native Default

STATE OF NORTH CAROLINA IN THE GENERAL COURT OF JUSTICE
COUNTY OF BLADEN DISTRICT COURT DIVISION
FILE NUMBER: 05CVD250

PLAINTIFF
[Redacted] WALKER

VS. ORDER OF ARREST
FOR SUPPORTING PARENT'S
FAILURE TO COMPLY WITH COURT ORDER

DEFENDANT
[Redacted] SMITH

[Redacted]
BLADENBORO, NC 28320
DOB: 12-[Redacted]

COURT DATES ATTACHED

SEX: MALE
SS#: 242-[Redacted] DL#: 000027-[Redacted] SUSPENDED

THE ABOVE NAMED DEFENDANT WAS FOUND TO BE IN CIVIL CONTEMPT OF THIS COURT FOR HIS WILLFUL FAILURE TO COMPLY WITH THE ORDERS OF THIS COURT FOR CHILD SUPPORT.

THAT A CIVIL CONTEMPT ORDER WAS ENTERED IN THIS CAUSE ON THE 21ST DAY OF MAY, 2013 COMMITTING THE DEFENDANT TO THE CUSTODY OF THE SHERIFF OF BLADEN COUNTY FOR A PERIOD OF INDEFINITE DAYS; AND THAT THE SAID COMMITMENT OF PHYSICAL CUSTODY OF THIS DEFENDANT WAS STAYED UPON THE CONDITIONS THAT THIS DEFENDANT WOULD COMPLY WITH THE PROVISIONS AS SET FORTH: THAT THE DEFENDANT WAS ORDERED TO PAY \$150.00 BY 9:30AM JUNE 21ST, 2013 OR AN IMMEDIATE ORDER FOR ARREST ISSUED UPON THE DEFENDANT AT SUCH TIME AS HE DID NOT COMPLY WITH SAID ORDER, THE DEFENDANT IS OUT OF COMPLIANCE AS HE DID NOT PAY THE \$150.00 by 9:30AM 06/21/2013 AND PER JUDGE USSERY AN IMMEDIATE ORDER FOR ARREST IS TO BE ISSUED FOR \$1531.93.

THAT A COPY OF THE ORIGINAL ORDER, DATED THE 13TH DAY OF JUNE 2013 IS ATTACHED HERETO AND INCORPORATED **HEREIN** BY REFERENCE;

Document

Edit PII Review

SSN/DL Review
Reviewed (SSN+INFO):
SSN Extraction: 242-[Redacted]
DL Extraction: 000027-[Redacted] NCDL suspended

PII Reporting (PII_Data Subject Link) New Link Unlink

<input type="checkbox"/>	PII_Data Sub...	PII_SSN	PII_Address	PII_City	PII_State	PII_Postal C...
<input type="checkbox"/>	(All) (All)	(All)	(All)	(All)	(All)	(All)
<input type="checkbox"/>	Edit	Smith [Redacted]	242-[Redacted]	[Redacted]	Bladenboro	North Carolina 28320

Relativity - Google Chrome
Not secure relativity/Relativity/Case/Mask/PopupEdit.aspx?ArtifactID=35504798&ArtifactTypeL...

Edit PII Reporting: Smith, [Redacted]

PII_Reporting Layout Save Save and New Cancel

Default Category

PII_Data Subject Name (FULL): Smith [Redacted]

PII_Email: [Redacted]

PII_Address: [Redacted]

PII_City: Bladenboro

PII_State: North Carolina Manage

PII_Postal Code: 28320

PII_Country: USA Manage

PII_SSN: 242-[Redacted]

PII_Attorney Notes - Data Subject:



Custom PII Review

Coding Layout

Save Save & Back Cancel **PII Review**

SSN/DL Review

Reviewed (SSN+INFO)

SSN Extraction

DL Extraction

PII_Reporting (PII_Data Subject Link) New Link Unlink

1 - 2 of 2 | 10 per page

<input type="checkbox"/>	PII_Data Subject Na...	PII_SSN	PII_Address	PII_City	PII_State
	<input type="text" value="Filter"/>	<input type="text" value="Filter"/>	<input type="text" value="Filter"/>	<input type="text" value="Filter"/>	<input type="text" value="(All)"/>
<input type="checkbox"/>	Michael		Road	Bladenboro	North Carolina

Document Details

Control Number REL0000031510



Responding to Data Breaches

04

Conduct QC of Extracted Information

Human reviewers perform quality control review of extracted data.

Overall, automation increases speed of review by 50-75%.

Cost of using a tool is comparable to manual review BUT it has been proven to be more accurate.

05

Export Identified PII and Individuals for Notification

All information, extracted and manually compiled, is exported in table format for use in notification purposes upon completion of review.

Export provides: (1) individuals and contact information for notification; and (2) categories of PII found in breached data.

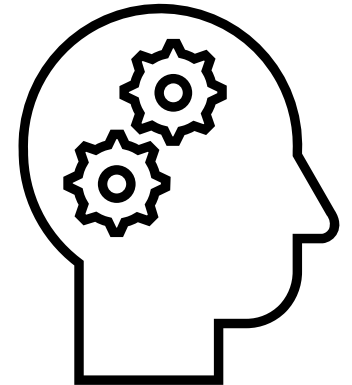
Pain Point #3 – Identifying and Tracking Legislation That May Affect Business

04



Pain Point #3

- Client in online education industry needed to identify and track proposed and enacted legislation across all 50 states that might affect its business interests (such as legislation related to for-profit universities generally, online education systems and specific specialties).
- Client had small internal team running daily web searches a few times a week but did not have sufficient human resources or technology tools to manage the process.
- Client needed:
 - Well-constructed and efficient workflows;
 - A dedicated outside team;
 - A software platform that could reliably identify and track relevant legislation; and
 - Customized, comprehensive written analysis and reporting.



Tech Solution: Policy Intelligence Platform

Utilize a tool like **POLITICO Pro** to customize and automate searching for, identifying and tracking potentially relevant legislation.

Policy intelligence platforms identify news articles, state and federal legislation, agency rule making, proposed election guidance and other materials that relate to company-specific issues.

Policy intelligence platforms do not replace the human altogether but instead allow the human to dedicate valuable time and resources to analyzing legislation and policies that may affect the company's business.

How Does the Process Work?

Human develops search terms and search criteria based on company-specific interests and inputs them into platform

Platform searches news sites, state legislation sites and hearing transcripts for new and existing, evolving initiatives

Platform returns results in real-time on customized dashboard with key terms and excerpts highlighted with references

Humans analyze excerpts to determine relevance, apply significance ratings and personalized notes

Humans create folders and pass important information up the chain as needed with built-in collaboration tools

Humans draft detailed reporting on bills of interest with commentary on areas of concern



Sample Dashboard and Search Results

Good Morning, Audrey
 Mon, Mar 1st | Denver, CO | 38° | ☀️

5 Projects | 0 Item Updates
 52 News Updates | 0 Contacts

CONGRESS IN RECESS

Education Licensure
 Shared: with 5 users | Created: 01/22/2021 | Last Upd...

TRACKED/SAVED | NEWS | NOTES | CONTACTS

RULE UPDATES | **BILL UPDATES**

PRO | Regulations | Search: "nurse practitioner" OR "MSN" OR "Masters in Nursing" OR "Masters of Science in Nursing" OR "Commission on Collegiate Nursing Education" OR "CCNE"

RULES | COMMENTS | PRIORITY/STANCE

1-18 of 18 results in Regulations | Sort by: Relevancy

FILTER RESULTS | + SAVE SEARCH | SAVE | DOWNLOAD CSV

RESULT TYPE
 Federal Regulations
 State Regulations

STATE
 Select State(s) +

AGENCY
 Select Agency(s) +

TOPIC
 Select Topics(s) +

STATUS
 Final Rule (7)
 Proposed Rule (3)
 Notice (0)
 Executive Order (0)
 Emergency Rule (0)
 Withdrawn (0)

START DATE

TEXAS - Final Rule

Epinephrine Auto-Injector Policies in Youth Facilities

Agency: TX - Department of State Health Services
 State Code: 25 TAC §640.21 - 60.28
 Published: 02/09/2021
 the Texas Nurses Association, the Texas **Nurse Practitioners**, and the Texas School Nurses Organization

MISSISSIPPI - Proposed Rule

Title 23: Medicaid, Part 224: Immunizations, Chapter 1: General, Rules 1.1 - 1.6.

Agency: MS - Division of Medicaid
 State Code: Title 23, Part 224, Chapter 1, Rule 1.3, Title 23, Part 224, Chapter 1, Rule 1.7, Title 23, Part 224, Chapter 1, Rule 1.5, Title 23, Part 224, Chapter 1, Rule 1.6, Title 23, Part 224, Chapter 1, Rule 1.4, Title 23, Part 224 Chapter 1, Rule 1.1, Title 23, Part 224 Chapter 1, Rule 1.2
 Published: 02/03/2021
 Medicaid fee schedule. 1. Physicians, **nurse practitioners**, and physician assistants. a) For vaccines

COLORADO - Final Rule

2 Ccr 502-1 Behavioral Health

Agencies: CO - Department of Human Services, CO - Behavioral Health



Pain Point #4 – Identifying and Collecting Data from Incongruous Databases

05



Pain Point #4

- Client in the automotive technology industry was experiencing:
 - a subpoena backlog – average of 896 subpoenas annually across dozens of subsidiaries from federal and state law enforcement and government agencies requesting detailed transaction records from vehicle transfers, auctions and sales; and
 - heavy staff turnover due to workloads.
- Responding to subpoenas required:
 - a human to search a dozen databases from different corporate and division systems one-by-one for responsive documents, export those documents and organize them for review and production; and
 - a human to review/redact records, draft form objections and prepare formal response.

Average 896
subpoenas/year

74.2% increase in
subpoenas over last
5 years

Backlog of 795
subpoenas at time of
engagement

26.6% of closed
subpoenas are
reopened and not
captured in metrics

Tech Solution: Intelligent Automation Bot

A software robot, commonly referred to as a “**bot**,” is a virtual helper that automates repetitive tasks that employees perform each day.

The bot was created in coordination with the company’s Enterprise Applications Engineer using Ui Path, a Robotics Process Automation (RPA) tool with a license cost of \$25K/year.

Bot automation relies on software to interact with applications, systems and workflows to mimic steps a human would take, but without human intervention.

Bots do not replace human workers but instead handle tedious processes so employees can focus on more strategic, value-added initiatives.

*Almost any standardized, repeatable process can be automated with a bot.

How Does the Bot Work?

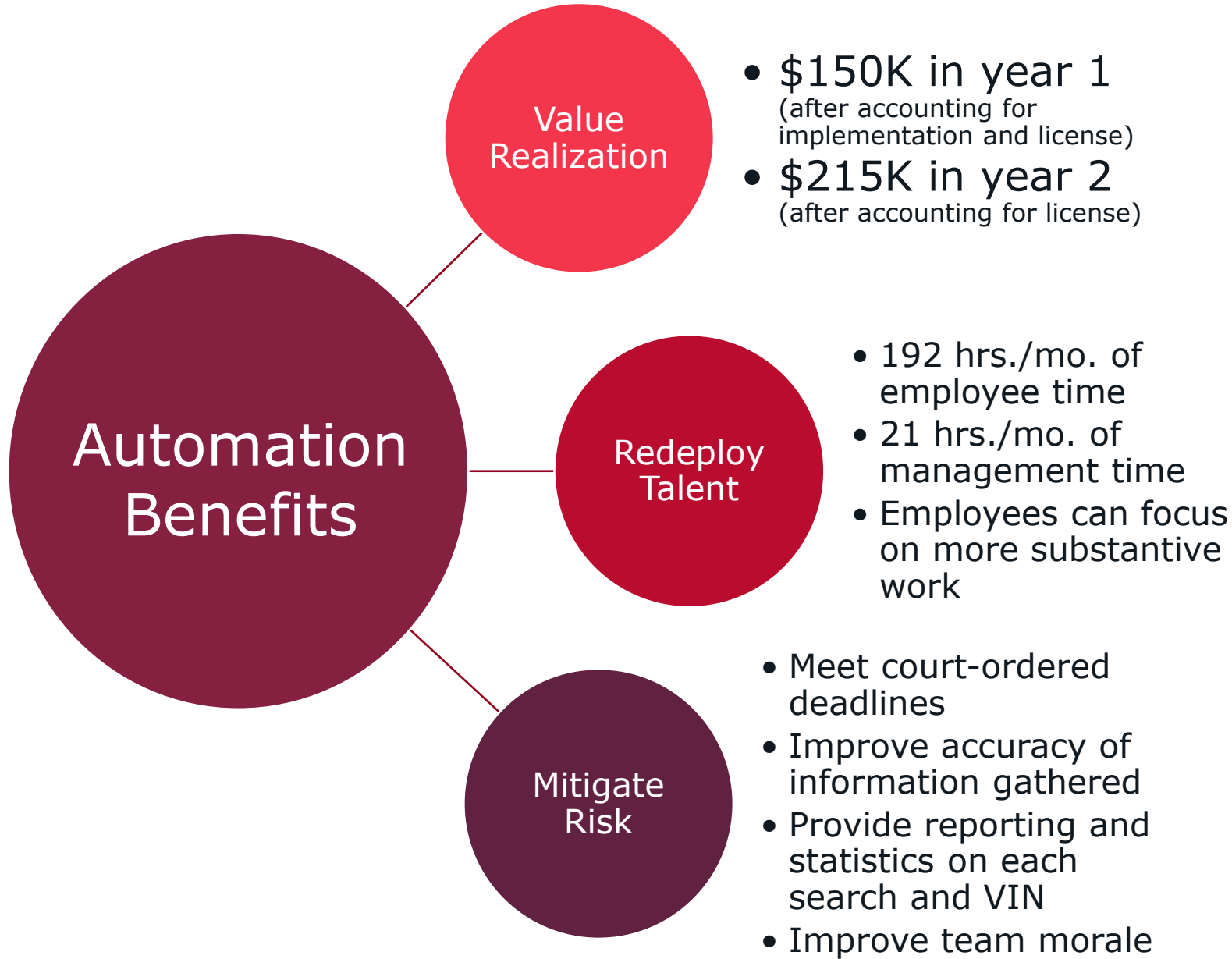
Retrieves list of VIN numbers from file

Logs into various applications (Salesforce, Workbench, CyberARK, etc.) with its own credentials and access rights

Searches for VIN numbers within those applications

Clicks on relevant files and exports them with files named as programmed

Uploads to specific case folder in SharePoint in precise order needed for production



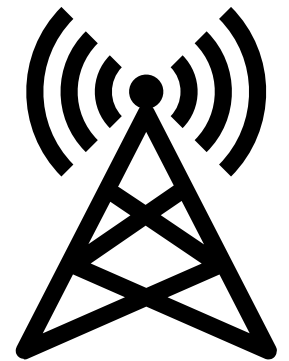
Pain Point #5 – Tracking Bad Actors Committing Fraud to Harm Business

06



Pain Point #5

- Client in the telecommunications industry sold mobile devices that were locked from being used with competing telecom companies. If existing customer sold their device, the buyer would need to register it with the same mobile device services provider.
- To circumvent the lock, the buyer could purchase an unlocking tool online via secondary market sellers. The buyer could then register their newly-purchased mobile device with another provider.
- Client wanted to identify these unlocking tools, software or services and send cease and desist letters to the sellers.
- Client did not have the human resources to monitor online sales and track offenders.



Tech Solution: Automated Monitoring

Utilize a tool like **X1 Social Discovery** to automate the searching for and collecting of evidence of unlocking tools.

X1, recently acquired by a company named Pagefreezer, searches across the entire web or across more specific websites for identified content and collects it in prescribed format.

X1 does not replace the human altogether but instead allows the human to dedicate valuable time and resources to more substantive analysis of X1's findings.

*Before using X1, client was taking screenshots of postings. X1 provides a significant advantage because it captures a moment in time in a defensible way. It can be used anytime you need consistent, repeatable monitoring.

How Does the Process Work?

Similar to Google alert, human inputs search terms and search criteria into X1 (entire web or specific websites)

X1 searches across web and filters for content containing search terms or meeting other specific criteria

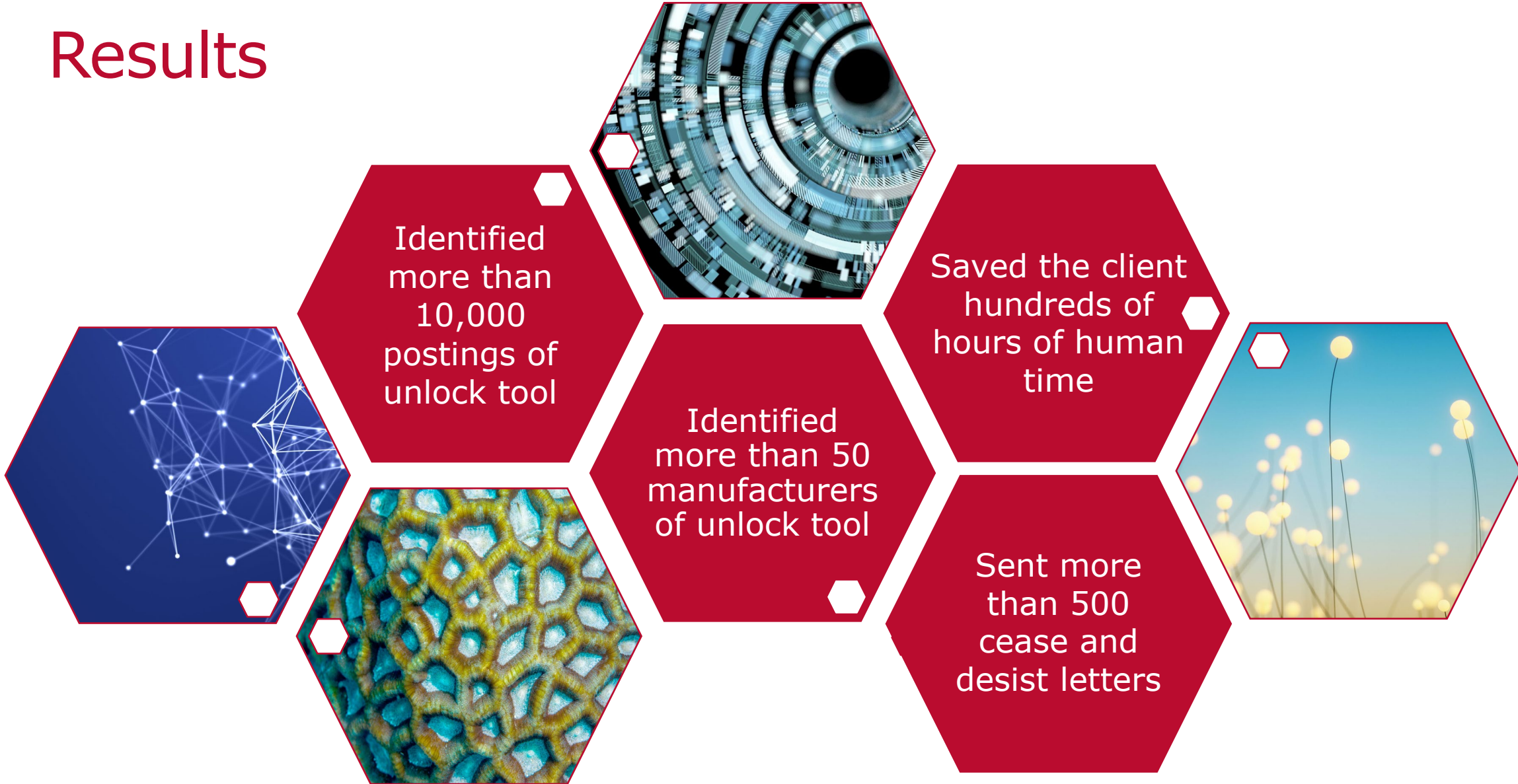
X1 collects webpages in real-time and in native format with all metadata intact and exports them for analysis

Human reviews web captures (can be within e-discovery software) and tags them based on type of product, manufacturer and seller

Using pre-populated template, human sends cease and desist letter with native web capture showing harmful activity



Results



Pain Point #6 – Tracking Customer Complaints for Witnesses and Experts

07



Pain Point #6



36,000+ customer complaints produced in discovery (social media, email and letters)

Unknown number of duplicate customers and complaints

Identify at least 10 customers willing to testify at trial

Customer Complaints and Potential Witness Tracking

Ideal customer witnesses met 7 criteria:

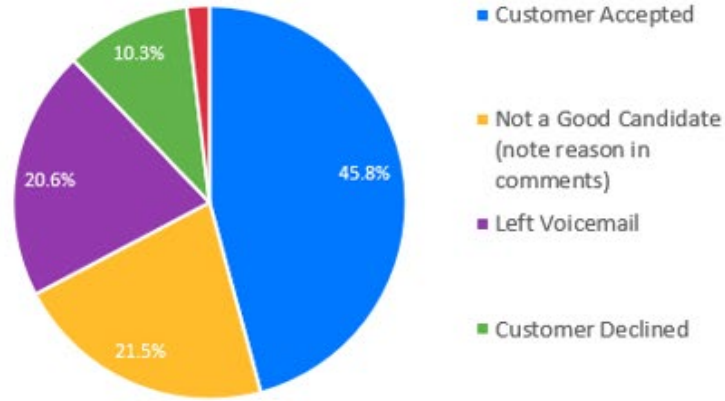
1. Longtime, loyal customers
2. Received adulterated food
3. Submitted passionate complaint with pictures (with potential illness)
4. Requested but did not receive remediation
5. Have not purchased since
6. Will not purchase again in future
7. Willing to engage with us, sign affidavit and testify

"I am extremely disappointed. I ordered a full meal, including sides, on April 1 for delivery on Sat., April 11 for my elderly mother. It did not arrive until two days after Easter. I called customer service and was on hold for 6 ½ hours. When it did arrive, it was not cold at all. No Styrofoam cooler as advertised, no ice packs, the containers were open and leaking, no wrapping. This was supposed to be my mother's Easter meal! She lives alone, the world is shut down and her holiday was ruined! You have lost a customer for life!"

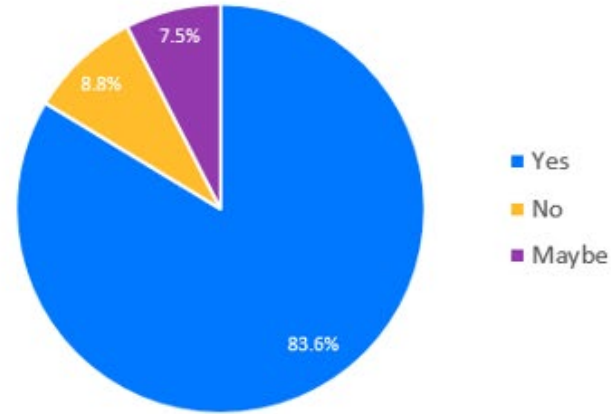
Customized Tracking of Complaints and Customer Communications

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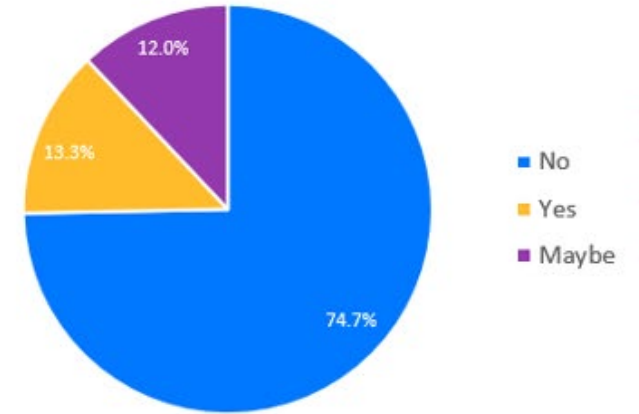
Call Status



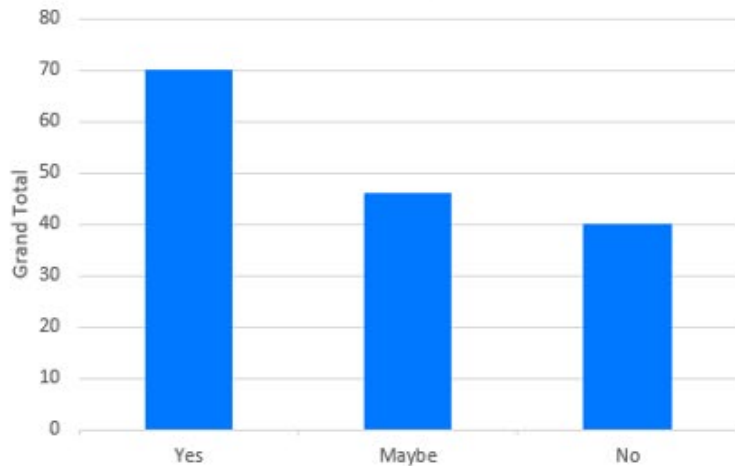
Open to Further Contact?



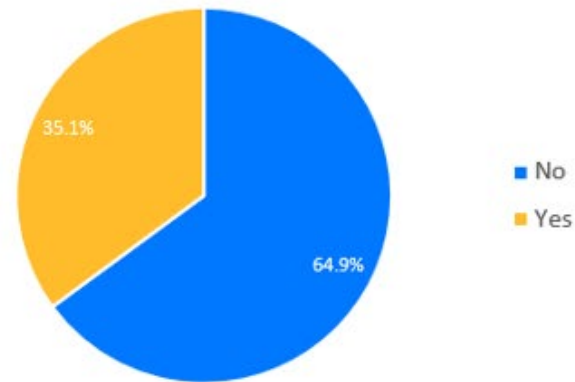
Discussed on Social Media?



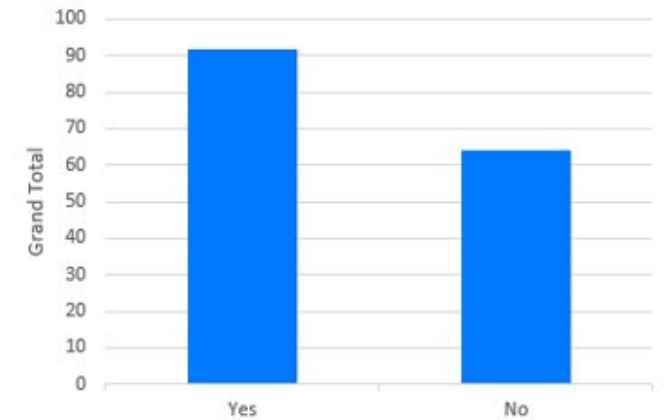
Will Purchase Again?



Post-Easter 2020 Purchase?



Received Remediation?



Expert's Analysis of Brand Impact Using Statistical Sampling

Using the sampling feature in Relativity, experts reviewed 10% of customer complaints and concluded:

- The company's behavior between March 2020 and May 2021 generated 24,591 distinct complaint communications
 - 17,775 concerned a negative impact to special occasions or gifting occasions
 - 3,356 concerned poor product quality
 - 1,730 concerned effects on food safety and personal health
 - 8,179 concerned a poor resolution to an initial complaint
 - 5,872 concerned general problems with ordering and shipping

Sampling in Relativity:

With sampling, Relativity generates a randomized subset of a larger population that can be used to identify characteristics of the whole population.

To execute sampling, Relativity uses a randomized algorithm which guarantees an efficient and unbiased result.

Sampling was approved by the court.

Pain Point #7 – Volume NODs and Arbitrations

08



Pain Point #7

Client needed:

- Team to handle backlog
- Platform to store customer records, correspondence and briefs
- Platform to manage the work of 28 contract attorneys and paralegals, 5 team attorneys and 2 managers
- Detailed, comprehensive, real-time tracking and reporting

3000+
active NODs

350+ active
Arbitrations

200-400 new
disputes each
week

How Does the Process Work?

Client sends
NODs and
arbitrations via
secure file
sharing site
(Kiteworks)

Documents
ingested into
Relativity
where
identifying
information is
extracted into
fields

Humans
analyze claim
and propose
solution

Humans
communicate
directly with
claimant or
claimant's
counsel and the
AAA, file
pleadings and
handle hearings

All activity
tracked in
customized
database with
real-time
reporting for
client

Client Tracking and Reporting

10 - NOD Processing iQ CTRL+F Alerts | Favorites | Hi, Caroline

Case Documents Entities LitSmart AutoTasker Batches Media Tracking Reports Client Admin System Admin Indexing & Analytics OCR Imaging Processing LitSmart AutoReporter

dtSearch Enter Search Terms Add Widget MASTER DASHBOARD Export

▼ KTS_NOD Status (NEW) by _NOD Specialist Assigned 1 - 25 / 33 | 25 per page

_NOD Specialist Assigned	Admin Only -...	Analysis and...	Closed	Follow-Up Q...	Initial Contac...	Initial Intake ...	NC/OR Letter...	Research Pe...	Settlement E...	Settlement I...	Settlement O...	Settlement R...	Waiting on W9	(blank)	Grand Total
Contractor 1	0	47	811	9	0	2	43	31	4	1	109	68	23	317	
Contractor 2	2	14	844	19	7	1	8	135	6	0	96	11	21	220	
Contractor 3	0	8	1,024	183	2	1	12	8	5	3	61	5	20	1	
Contractor 4	0	82	670	21	9	3	10	41	7	0	191	4	24	185	
Contractor 5	0	103	574	15	0	1	71	14	13	1	174	29	32	140	
Contractor 6	0	65	607	5	73	4	10	40	6	1	125	17	14	142	
Contractor 7	1	0	3	0	0	542	0	0	0	0	0	0	0	144	
Contractor 8	0	1	505	12	0	1	7	32	1	12	82	18	15	0	
Contractor 9	0	2	600	4	0	0	4	1	0	2	21	2	19	0	

▼ KTS_NOD Status (NEW) 1 - 14 / 14 | 25 per page

KTS_NOD Status (NEW)	Grand Total
Closed	8,330
(blank)	1,615
Settlement Offer Sent / Post Offer Negotiations	1,406
Initial Intake Pending	797
Follow-Up Question Sent	477
Analysis and Negotiation	435
Research Pending	435

All 14,430 Edit

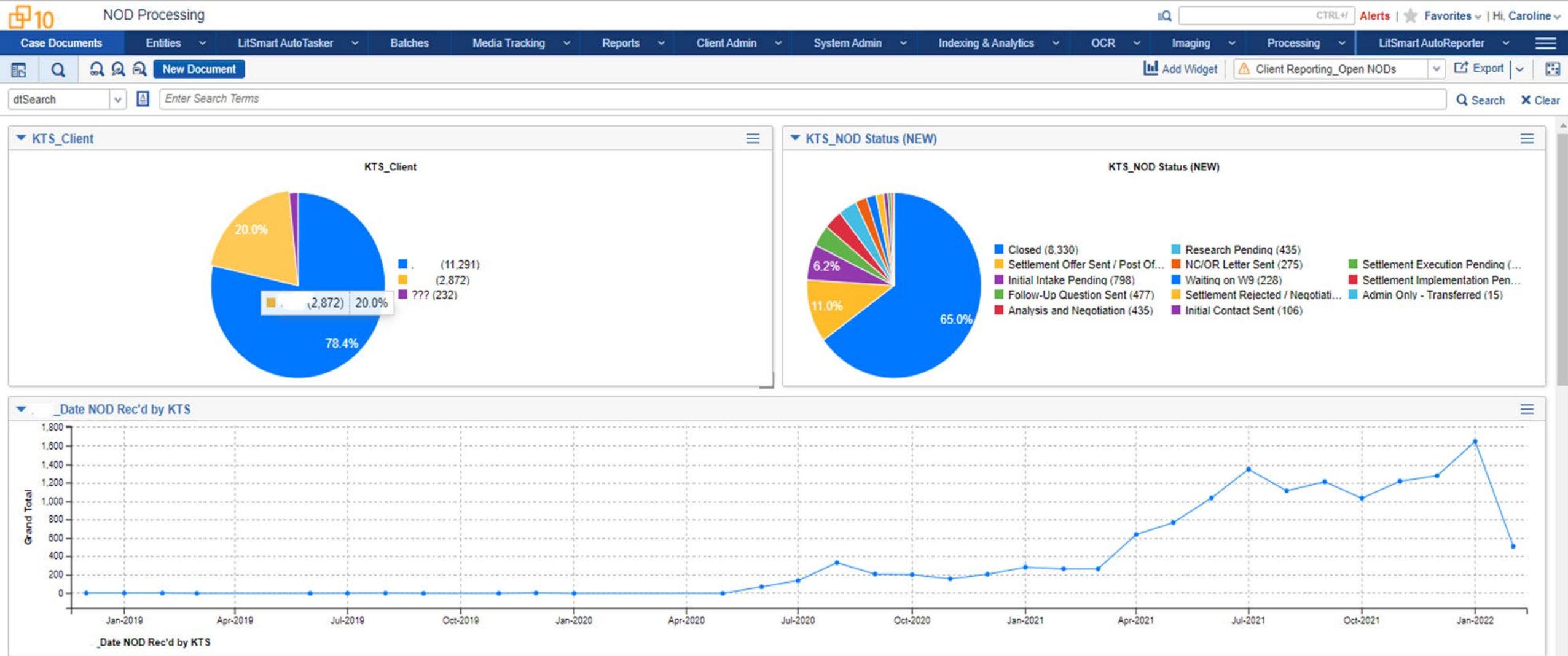
▼ _NOD Specialist Assigned 1 - 25 / 33 | 25 per page

_NOD Specialist Assigned	Grand Total
Contractor 1	1,465
Contractor 2	1,384
Contractor 3	1,333
Contractor 4	1,247
Contractor 5	1,167
Contractor 6	1,109
Contractor 7	690

Total Items: 14,430



Client Tracking and Reporting



The Rise of Generative AI in E-Discovery

09



Important Baseline Concepts

- **Large Language Model** – A type of AI that takes text as input and generates text as output. LLM is trained on billions of documents from open datasets and the web.
- **Generative AI** - AI that takes a variety of inputs to create new content in a variety of outputs. Inputs and outputs include text, images, sounds, animation, models, etc.
- **OpenAI** – Inventors of ChatGPT.
- **Microsoft Azure** – Securely hosts enterprise versions of ChatGPT and GPT-4.
- **GPT-4 and GPT-4 Turbo** – OpenAI's next generation models.



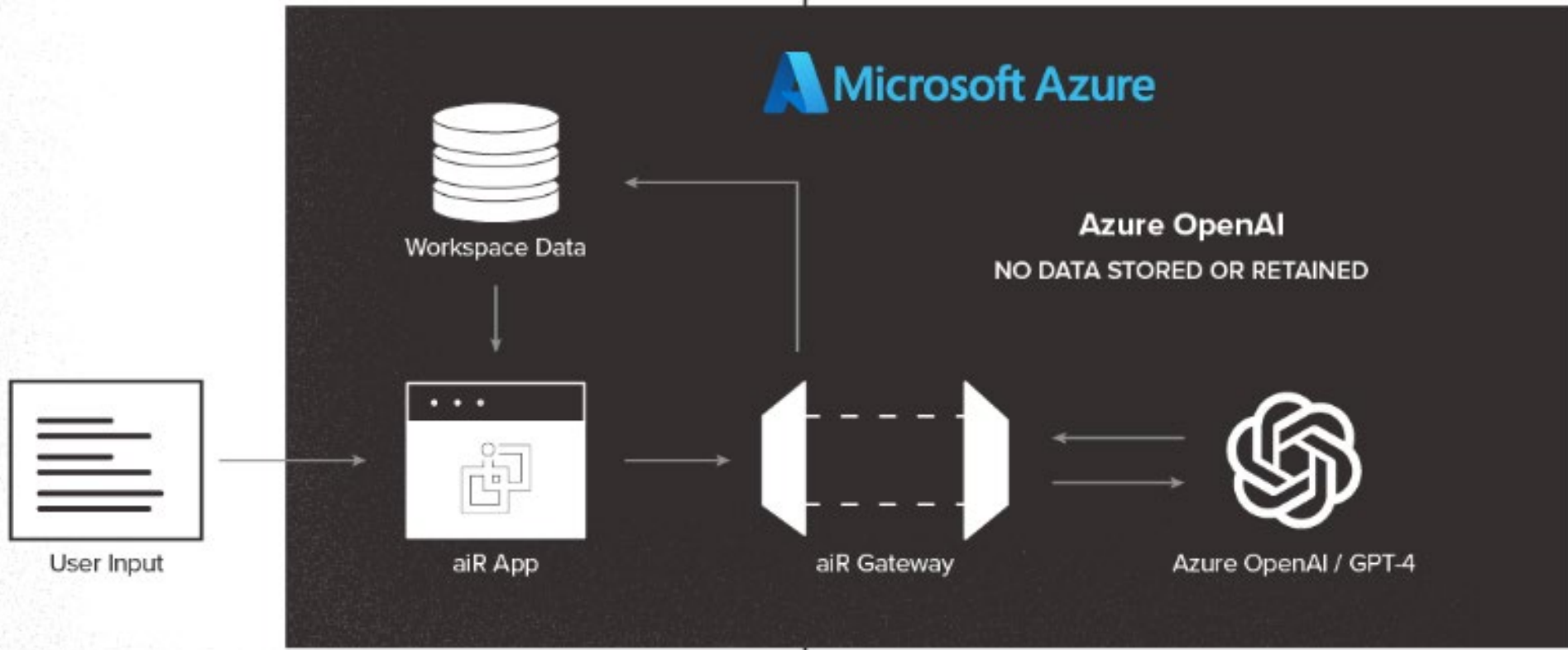


Relativity[®] aiR

for Review

Limited General Availability (LGA) for Kilpatrick

 Relativity one



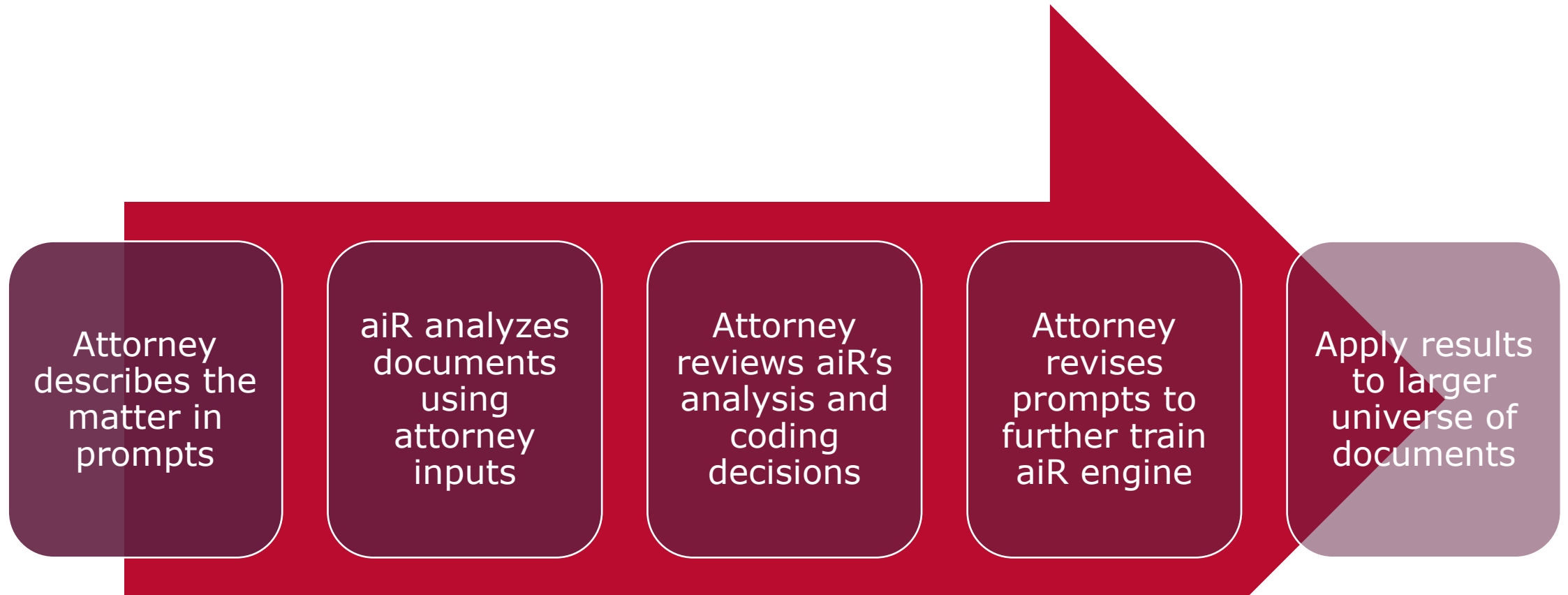
aiR is a closed system. aiR does not feed data into Chat GPT but instead uses Chat GPT's technology in its functionality.



Limited General Availability (LGA) for Kilpatrick

aiR Workflow

for Responsiveness, Key Documents and Issues



Add information about the case to set the context for the analysis. This should be similar to the information provided in a Review Protocol.

Matter Overview ? *

The following is a discrimination investigation. BigThorium is a company that is the subject of the project. The company is facing allegations of discriminatory treatment as retaliation against employees who opposed the company's unlawful conduct. Employees of BigThorium.

People and Aliases ?

- William Davis, Director of Operations (Alias: Bill): wdavis@bigthorium.com
- Francis Ham, CEO (Alias: Frank): fham@bigthorium.com
- Samantha Jones, Recruiter (Alias: Sam): sjones@bigthorium.com
- Arvind Patel, Welder: apatel@bigthorium.com
- Muhammad Kumar, Welder: mkuman@bigthorium.com
- Natasha Green, Attorney: ngreen@gnspartners.com
- Ionut Albu, Crane Operator: ialbu@bigthorium.com, ionut.albu@protonmail.com

Noteworthy Organizations ?

- BigThorium complaints
- CNCinCar
- GNS Partners

Noteworthy Terms ?

- Papers: sl

In addition to relevance, identify documents that might be significant and impactful to the case. Select a single choice field for the Key Documents field, and a choice to reference for predictions. aiR will not write directly to this field.

Key Document Field * Issues

Key Document Choice * Choose...

Key Document Criteria ? *

Direct Evidence: A relevant document that directly proves or disproves a material fact in the case is of utmost importance. It provides clear and concrete evidence that directly supports or undermines a crucial element of the case.

High Level of Involvement: Documents that demonstrate the active involvement or knowledge of key individuals or departments within BigThorium are highly valuable. These documents can establish the level of responsibility, decision-making authority, or awareness of those involved in the alleged discriminatory treatment.

Decision-Making Processes: Documents that shed light on the decision-making processes within BigThorium, especially regarding profit over safety or retaliation. They provide insights into the motivations, intentions, and actions taken by key decision-makers within the company.

Use to identify documents that might be considered relevant to the case. Select a single choice field for the Relevance field, and a choice to reference for predictions. aiR will not write directly to this field.

Relevance Field * Responsiveness

Relevant Choice * Responsive

Relevance Criteria ? *

Documents are responsive if they contain information directly related to the legal issues, or provide context to the discriminatory treatment or retaliation faced by the employees.

Any documents containing communication between William Davis, Francis Ham, or Samantha Jones.

Issues Field ? Choose...

Limited General Availability (LGA) for Kilpatrick

Key is to Test, Revise and Test Again

- Run on 50 documents – Thoughtfully identify the 50 documents (within ideal date range, top priority custodians, etc.) and try to remove documents that system will not analyze (pictures, docs with too much text, docs without text, junk, etc.)
- Review aiR's analysis (relevancy ranking):
 - -1: Cannot analyze be analyzed – no text
 - 0: Junk
 - 1: Not relevant
 - 2: May be relevant but not sure
 - 3: Likely relevant
 - 4: Definitely relevant
- Revise prompts based on analysis – focus on #2s where system is not sure
- Run again
- Continue to revise prompts to better train system ***Training is critical**
- Once satisfied, feed into prioritized review as training seed set or run on larger population

*aiR does not learn from human coding like active learning aka prioritized review; instead, it learns from the prompts only

Customized Dashboards

aiR Relevance Analysis::Rank by Responsiveness							
Responsiveness	-1	0	1	2	3	4	Grand Total
Responsive	2	1	0	2	22	3	30
Not Responsive	5	0	5	4	6	0	20
Grand Total	7	1	5	6	28	3	50

aiR Key Analysis::Rank by Responsiveness							
Responsiveness	-1	0	1	2	3	Grand Total	
Responsive	2	1	9	7	11	30	
Not Responsive	5	0	14	1	0	20	
Grand Total	7	1	23	8	11	50	

aiR Relevance Analysis:: Rank by Responsiveness

- aiR 3: Humans coded 6 documents as not responsive; those 6 concerned unrelated projects and we had not sufficiently excluded those projects from the prompts
- aiR 0: aiR coded 1 document as junk; humans coded it responsive because document is a pdf of photos and is actually relevant (document had no text so should have been excluded)

Limited General Availability (LGA) for Kilpatrick



aiR for Review

one
BigThorium
All Documents
UN

Review Queues

Documents

Processing

Review Center

Reviewer Performance

Case Dynamics

Analytics

Production

Review Library

aiR ✔ Review complete! 2,345 documents were analyzed.

[View aiR Review Jobs](#)
[View Review Center Queue](#)

#	Control Number	aiR Prediction	aiR Citations	aiR Rationale	aiR Considerations
Filter		Filter	Filter	Filter	Filter
1	BTDW00000001	Likely Responsive	We have received evidence that implicates you in the theft that occurred on June 2 in our facility. As a result, we are officially terminating your employment with BigThorium, effective immediately.	This email shows that Muhammad Kumar's employment was terminated due to alleged involvement in a theft.	There is no information in the document rela evidence implicating Muhammad Kumar in t
		Likely Hot Doc	We have received evidence that implicates you in the theft that occurred on June 2 in our facility.	This could be evidence of retaliation if the theft accusation is false and made in response to Muhammad opposing the company's unlawful conduct.	If the theft accusation is true and not related opposition to the company's conduct, then t would not be evidence of retaliation.
2	BTDW00000002	Not Responsive	na	This document does not provide any information about BigThorium enforcing segregated living or working conditions based on race.	It is possible that the environmental impact a mitigation strategies could indirectly relate t working conditions, but there is no direct evic document.
		Not Hot Doc	na	This document does not provide any information about BigThorium enforcing segregated living or working conditions based on race.	It is possible that there is some context miss document that could reveal luring practices, i direct evidence in the text.
3	BTDW00000003	Not Responsive	How can we ensure that the barracks for the international workers are built at minimal costs?	The document discusses minimizing costs for international workers' barracks, but there is no direct evidence of BigThorium coercing employees into staying by controlling their living conditions and underpayment.	The mention of minimizing costs for internat barracks might be indirectly related to contro conditions, but there is no evidence of coerci underpayment.
		Not Hot Doc	na	There is no mention of Muhammad Kumar, Arvind Patel, or any retaliation against employees in the document.	There is no information in the document that interpreted as relevant to this issue.
3	BTDW00000003	Likely Responsive	Inform them that due to not meeting construction deadlines on time, they will have to make up for the additional housing cost increase by having their pay docked.	This snippet shows that Indian workers are being treated differently in terms of their pay, as they are being docked for housing costs due to not meeting construction deadlines.	It is possible that this pay docking is a stand for all workers who do not meet deadlines, as specifically targeting Indian workers.
		Likely Hot Doc	Since we separated the Indian workers' housing from the others, I've noticed an increase in agitation among them.	Shows that BigThorium has enforced segregated living conditions based on race, as Indian workers' housing has been separated from the others.	It is possible that the separation of housing v reasons other than race, such as language b differences.
3	BTDW00000003	Not Responsive, Junk	You are cordially invited to attend a webinar on Enhancing Productivity, organized by BigThorium in collaboration with XYZ Consultancy.	This document is an invitation to a webinar on productivity and does not provide any evidence of BigThorium luring workers to the project by promoting their ability to get their workers permanent citizenship.	It is possible that the webinar could indirectly related to worker recruitment, but there is no in the document.
		Not Hot Doc	na	This document does not provide any information	It is possible that there is some context miss

Exit viewer HD00004

Native No Images No PDFs Extracted Text No Productions

100% Search within document

Review Analysis

Responsiveness
Likely Responsive

Rationale
Suggests that BigThorium is coercing employees into staying by threatening to send them home if they don't stop complaining and increase production; has enforced segregated living conditions based on race, as Indian workers' housing has been separated from the others; and that Indian workers are being treated differently in terms of their pay, as they are being docked for housing costs due to not meeting construction deadlines.

Considerations
It is possible that coercive statements are not meant to be taken seriously and are just a way to motivate workers to increase production. Separation of housing could have been done for reasons other than race, such as language barriers or cultural differences. It is possible that this pay docking is a standard procedure for all workers who do not meet deadlines, and not specifically targeting Indian workers.

2. Since we separated the Indian workers' housing from the others, I've noticed an increase in agitation among them. Page 1

3. Inform them that due to not meeting construction deadlines on time, they will have to make up for the additional housing cost increase by having their pay docked. Page 1

1. Inform the workers that if they don't step up production and stop complaining they will have to return home. Of course we know that won't happen.

Hot Doc
Unlikely Hot

Comments

Review Protocol

Coding Layout
Save & Next Save Cancel First Pass with aiR

Analysis
aiR predictions are displayed below. Change the prediction or click "Save" or "Save and Next" to accept it. View detailed analysis.

Overview

Responsiveness Responsive
 Non-Responsive
 Needs Further Review
 Technical Issue

Hot Doc Yes
 No

Family Group Document History

From: William Davis wdavis@bigthorium.com
To: Francis Ham fham@bigthorium.com
Subject: Re: Housing situation
Date: Thu, 29 Jun 2017 14:52:21 -0500 (EST)

Hi Frank
 I wanted to give you a quick update on the housing situation. Since we separated the Indian workers' housing from the others, I've noticed an increase in agitation among them. Some are even voicing complaints about being treated unfairly.

Bill

William Davis
 Director of Operations

From: Francis Ham fham@bigthorium.com
To: William Davis wdavis@bigthorium.com
Subject: Re: Housing situation
Date: Thu, 29 Jun 2017 15:07:39 -0500 (EST)

Bill
 Thank you for the update. You have my permission to increase the housing cost for the Indian workers. Inform them that due to not meeting construction deadlines on time, they will have to make up for the additional housing cost increase by having their pay docked. Inform the workers that if they don't step up production and stop complaining they will have to return home. Of course we know that won't happen.
 Let me know if this resolves the issue.

Frank



The GenAI Piece

Likely Responsive Example:

- **aiR Rationale**

This snippet shows that Indian workers are being treated differently in terms of their pay, as they are being docked for housing costs due to not meeting construction deadlines.

- **aiR Considerations**

It is possible that this pay docking is standard for all workers who do not meet deadlines and not specifically targeting Indian workers.

Likely Hot Example:

- **aiR Rationale**

Shows that BigThorium has enforced segregated living conditions based on race, as Indian workers' housing has been segregated from others.

- **aiR Considerations**

It is possible that the separation of housing has reasons other than race, such as language differences.

AI in E-Discovery Considerations

1. Cost and Data Size Limitations

- Use of AI tools is add-on cost (beyond standard license)
- Limited to running on documents less than around 40 pages each and a maximum of 10K documents at a time based on AI engine capacity (expected to increase significantly in 2025)

2. Acceptance by Courts

- Has not been tested by courts as part of discovery and document production process – see EDRM repository
- As a result, consider creative use cases such as (1) feeding results into prioritized review; or (2) running on produced documents for deposition and trial prep

3. Acceptance by Legal Teams and Clients

- Need client approval and outside counsel guidelines may not suffice
- Is aiR more accurate than human coding? Relativity and other law firm testing says yes – 85% accurate after first test run and improved to 98% accurate after several iterations.
- Will aiR replace the need for document review by attorneys? No! Think of aiR as a “very fast first pass reviewer.”
- Attorneys will still be needed for aiR consulting and management, prompt creation and testing, QC review, sampling review, privilege review, privilege logging, documents that cannot be analyzing using aiR, reporting, etc.

Questions?

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Kilpatrick

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