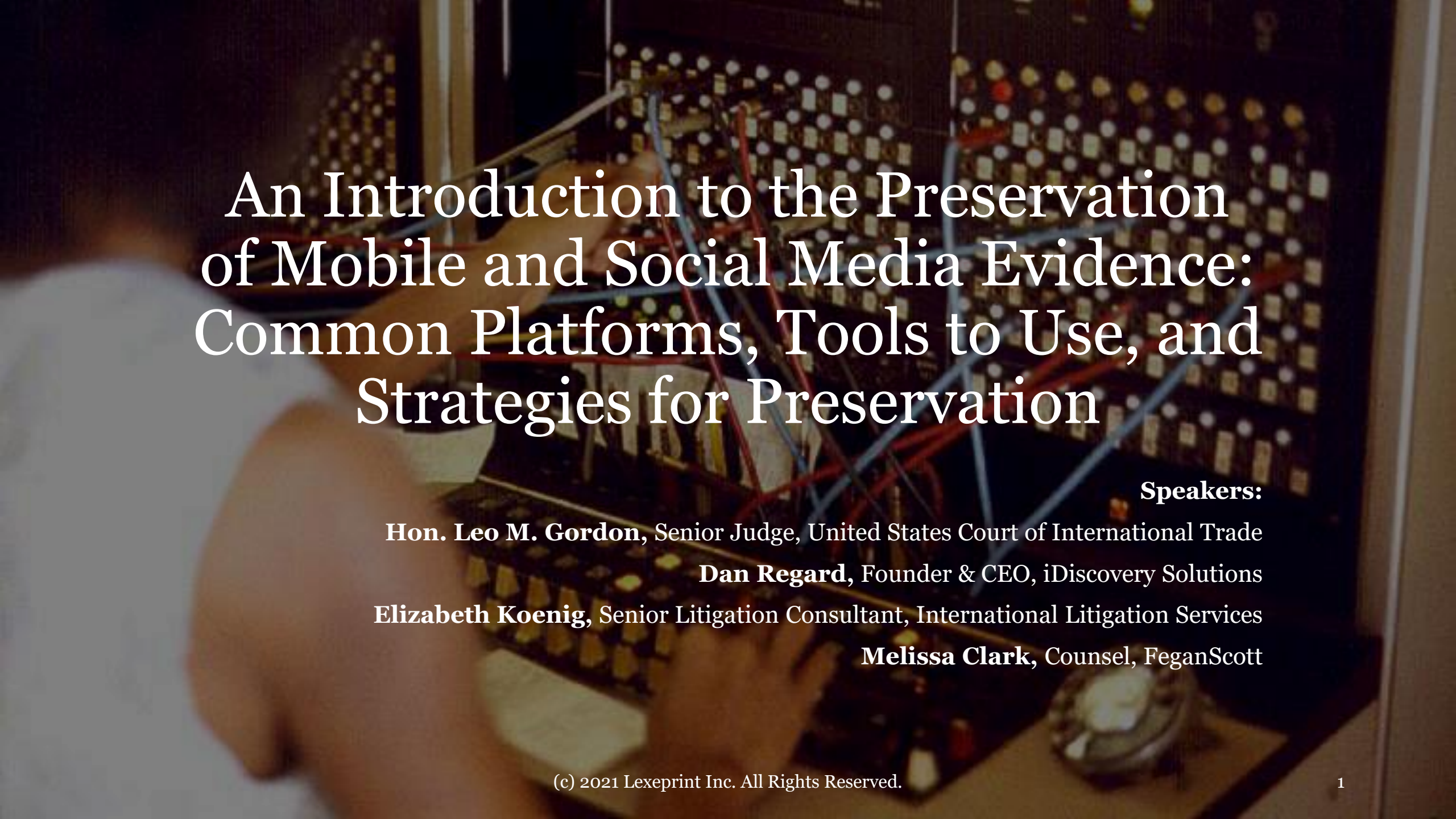


An Introduction to the Preservation of Mobile and Social Media Evidence: Common Platforms, Tools to Use, and Strategies for Preservation

Speakers:

Hon. Leo M. Gordon, Senior Judge, United States Court of International Trade

Dan Regard, Founder & CEO, iDiscovery Solutions

Elizabeth Koenig, Senior Litigation Consultant, International Litigation Services

Melissa Clark, Counsel, FeganScott

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Agenda

- Review of eDiscovery Preservation Requirements
- Managing Business Communications on Non-Company Apps
- Preservation Best Practices and Retrieving Deleted Data
- Business Communications on Personal Devices - What can happen?
- Review of Structures of Policies that Can Be Implemented
- Failure to Preserve Text and Instant Messages May Result in Sanctions
- Key Takeaways

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Overview

- Employees are increasingly using non-business communication applications ("apps") for business-related communications. E.g., iMessage, WhatsApp and WeChat.
- Since the COVID-19 pandemic began, companies have seen an acceleration in this trend. Work-from-home arrangements continue to blur the traditional lines between "business" and "personal" time as many conversations that were typically held in person are now held virtually.
- A SEC enforcement action highlights the risk that these communications present for companies subject to strict record retention requirements.

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COVID-19

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Review of eDiscovery Preservation Requirements

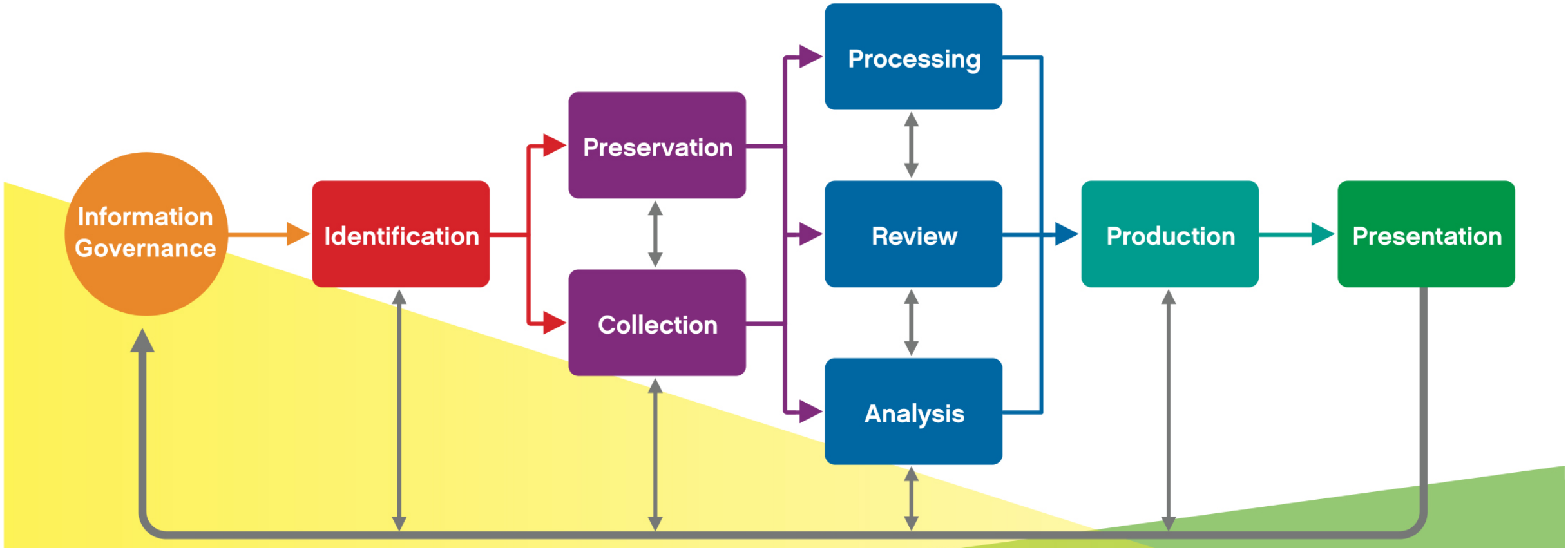
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What is eDiscovery?

- Electronic Discovery or “eDiscovery” is the general term used to describe the preservation and production of electronically stored information (“ESI”), typically done during the discovery phase of litigation.
- ESI can include: e-mails, texts, chats, instant messages, files, website activity and history, information posted on social networking websites, videos, audio, images, database (structured) data, and (very importantly) metadata (data about data).

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The Process of Electronic Discovery

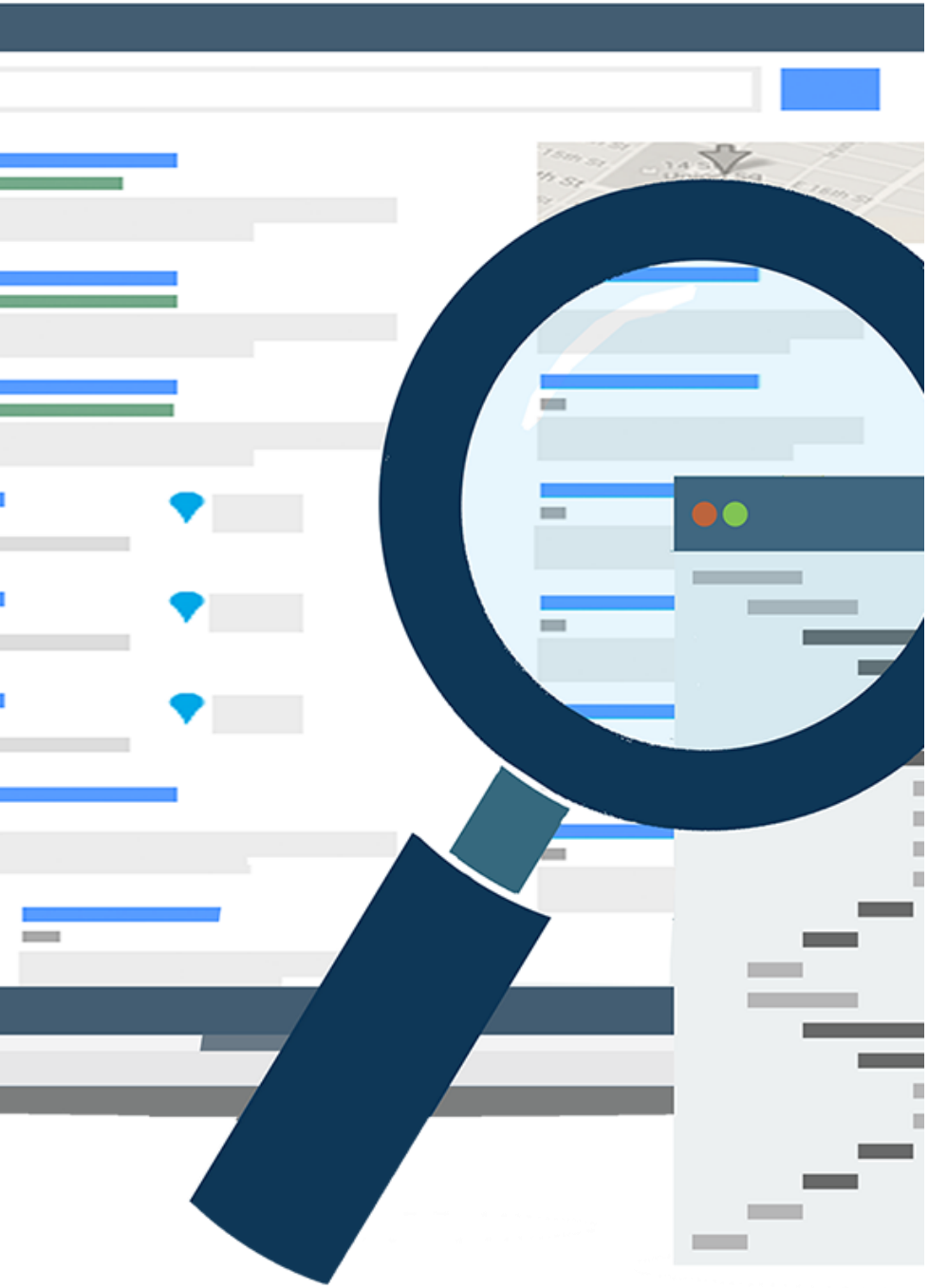
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The Duty to Preserve – What Are its Limits?

- The duty to preserve evidence does not change when the evidence in question comes from social media sites.
- If the litigation is ongoing or reasonably anticipated, deleting social media content could be understood by the courts as spoliation, especially if social media content has the potential to become relevant evidence in the trial.

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Rule 37. Failure to Make Disclosures or to Cooperate in Discovery; Sanctions

- (e) Failure to Preserve Electronically Stored Information. If electronically stored information that should have been preserved in the anticipation or conduct of litigation is lost because a party failed to take reasonable steps to preserve it, and it cannot be restored or replaced through additional discovery, the court:
  - (1) upon finding prejudice to another party from loss of the information, may order measures no greater than necessary to cure the prejudice; or
  - (2) only upon finding that the party acted with the intent to deprive another party of the information's use in the litigation may:
    - (A) presume that the lost information was unfavorable to the party;
    - (B) (B) instruct the jury that it may or must presume the information was unfavorable to the party; or
    - (C) dismiss the action or enter a default judgment.

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Managing Business Communications on Non-Company Apps

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Things to Consider When Rolling out Mobile Messaging Apps



Security



Discovery



Monitoring and Required Regulatory Recordkeeping

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Security

- Companies do not have the control over the cybersecurity and privacy of employees' personal apps.
- Thus, business information that is communicated via these apps may be at a greater risk of being compromised.
- While, on the other hand, company's email and other communication platforms that are part of the firm's computer systems and protection will evidently be more secure. There will be a smaller risk of information being compromised.

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Mobile Discovery

- Typically, companies' servers will not capture employee communications sent or received through personal apps.
- Hence, when performing an 'internal investigation, addressing a litigation document request or responding to a regulatory investigation, companies may be unable, through their normal document search processes, to identify relevant documents that were sent using employees' personal apps.

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Monitoring and Required Regulatory Recordkeeping

- If a company is subject to regulatory recordkeeping requirements, or monitors business communications for other compliance, regulatory or cybersecurity purposes, that monitoring process will be unable to review communications on personal apps.

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Key Takeaways of discouraging Business Communications on Non-Company Apps

- For the reasons discussed above, many companies should simply prohibit the use of personal apps for business communications.
- Companies that are not subject to broker-dealer or investment adviser requirements have adopted policies that discourage such communications.
- However, they do recognize that such communications do occur. Thus, they created affirmative obligations to preserve such records.

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Preservation Best Practices and Retrieving Deleted Data

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Identifying All Sources of Electronic Evidence

- Personal computers at work and/or home
- Laptop computers and tablets
- Networked devices (*i.e.*, “the Internet of Things”)
- Photocopiers
- Removable media (disks, flash drives)
- Disaster recovery backup media
- Third-party providers (incl. social media)
- “Wearable” technology
- Random Access Memory (“RAM”)
- Slack space
- Residual data
- System data

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Sending Preservation Letters to Key Parties

- In Swick v. The New York Times Co. (N.J. Super. App. Div. 2003), the Superior Court of New Jersey Appellate Division affirmed a lower court ruling that receipt of a written notice created a non-party's duty to preserve the requested evidence (after neither party to the lawsuit challenged that the duty existed).

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Advising Your Client and Securing Evidence in Their Possession

- A well-defined, stipulated protective order is a necessary first step to secure evidence. It is unwise to assume that opposing counsel or other defined evidence custodian would have their evidence storage environment as secure as it needs to be.
- A security report from their technical expert would be reasonable to request. Chain of custody is imperative while transferring evidence from one location to another.

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Saving, Storing, Archiving and Re-Displaying

- There are several steps involved in the saving and storage of electronic evidence:
  - Inventory the evidence, record the location, and record who has access.
  - Create a lection on the appropriate server(s) that will be the forever home of the data.
  - Apply the requisite security to the data storage location.
  - Any production data should be saved.
  - Create a backup of the complete evidence folders.
  - Frequent analysis of data repositories should be performed.

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Self-Destructing Messages and Other Issues

- The idea is simple, a message can be sent that could configured to automatically deleted after a period of time.
- WhatsApp is the most popular app that allows this feature to be used.

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When the Data You Need is Deleted

1. DIY Recovery Tips
2. Using an Expert
3. Spoliation - Sanctions and Remedies

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Business Communications on Personal Devices - What can happen?

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Mixing Personal with Work and SMS – Settlement with JonesTrading Order

- What happened?
  - The SEC staff sought records from the firm and found references to text messages discussing the firm's business while conducting an enforcement investigation that was unrelated to the firm.
  - These messages were later found to be subject to retention requirements for broker-dealers because this business-related messaging occurred outside of JonesTrading's computer systems.
  - However, the firm could not preserve these texts and chats and thus, was not able to produce them as requested by the SEC.
  - Additionally, it was found that senior management was also aware that the employees were communicating with each other and with customers through text messages.

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Settlement with JonesTrading

- The SEC reached a settlement with JonesTrading Order for its failure to maintain business-related text messages.
- Pursuant to the SEC's order, JonesTrading's policies prohibited business-related communications outside of firm-sponsored systems.
- Their policies also prohibited their employees from using text messaging for business purposes. In order to monitor compliance, the firm depended on annual employee attestations and trainings.
- However, it was evident that these policies were not being instilled rigorously.

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Settlement with JonesTrading

- ‘The JonesTrading enforcement is based on the violation of the per se requirement for broker-dealers to retain business-related records.’
- However, the action has broader ramifications for companies that are not subject to such requirements.
- Essentially, there are a few compelling reasons for companies to limit their business-related communications to company systems only.

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Review of Structures of Policies that Can Be Implemented

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Business Records vs. Disposable Data



Companies can implement policies which distinguish business records from disposable data.

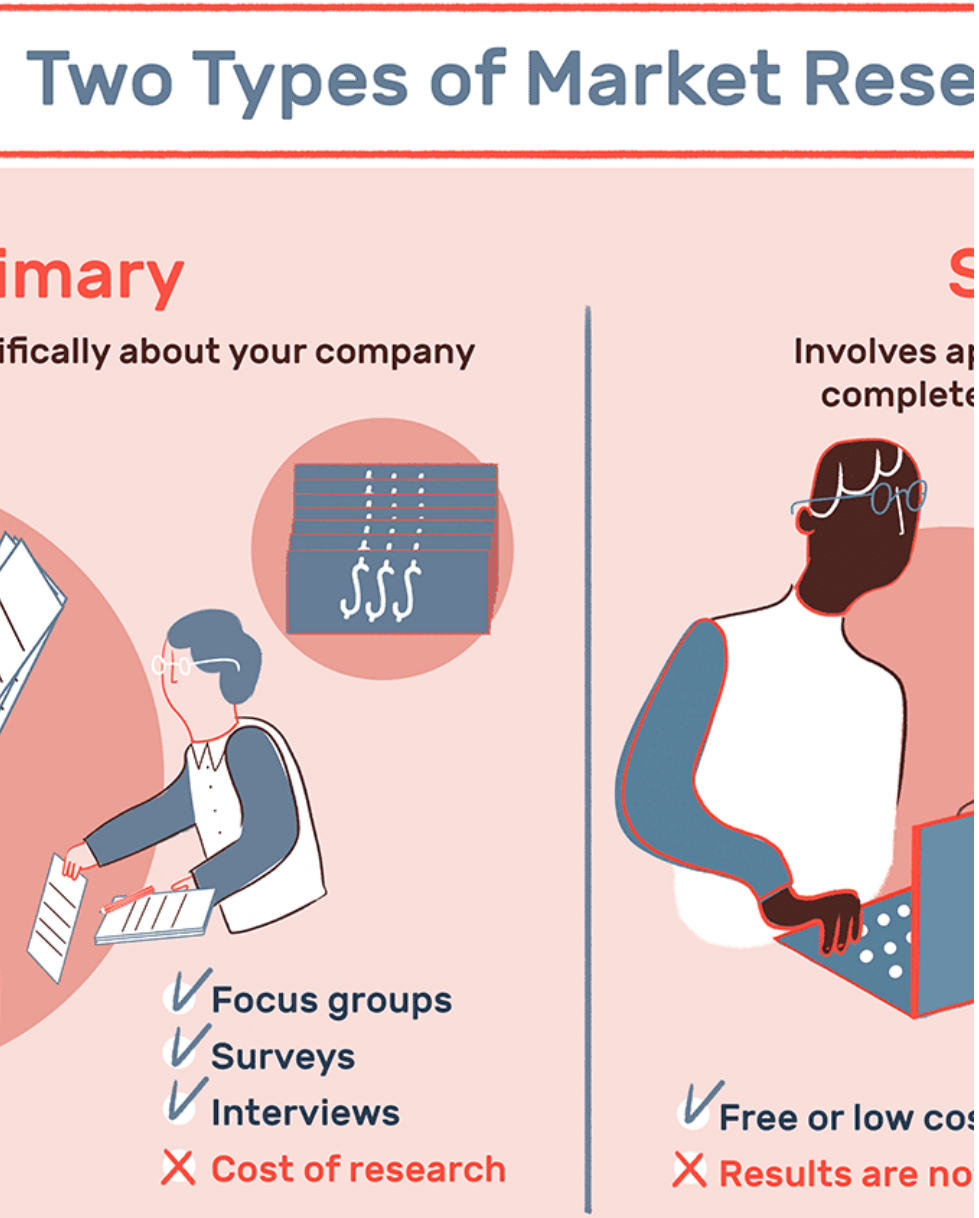


Business records must be preserved for two reasons; (1) There is a legal or regulatory requirement to preserve them or; (2) They have a lasting business value to the company



Disposable data will be information that does not need to be preserved.

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Primary vs. Secondary Communications

- Companies can implement policies where primary communications tools and secondary communications tools are defined.
- Primary communication tools can be defined as those that automatically preserve documents on the company's servers for extended periods of time;
  - E.g., work emails and their attachments
- Secondary communication tools will be voicemails, chats, instant messages.

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Business Records and Primary Communications

- Once these business records and primary communications tools are defined, these policies can then provide that employees mostly only use primary communication tools to transfer business records.
- However, these policies will recognize that exceptions will occur. They should then provide that if a business record is sent or received by an employee through a secondary communication tool, that employee must take positive steps to preserve that documents. This can include:
  - Ensure that the app is set for indefinite preservation
  - Employee promptly move the business record to a primary communication tool – taking a screenshot of the communication and sending the image to that employee's work email

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the

Takeaway

Takeaways of policies that can be implemented

- Each company's precise scope and wording of a messaging policy will depend on several factors that can implicate a variety of legal, HR, business, IT and reputational considerations.
- However, tailoring policies to suit the behavior of your employees, the applications that they use, and the expectations of the regulars may reduce regulatory risk.
- Additionally, it can reduce conflicts between employees when their devices need to be searched for company-related communications.

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Failure to Preserve Text and Instant Messages May Result in Sanctions

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First Financial Security, Inc. v. Lee

- Issue: The Defendants were compelled by court to present the plaintiffs with texts and emails around or after May 10, 2014 but failed to do so.
- Ruling: The Defendants were sanctioned by the court with adverse inference instructions as the Defendants did not comply with the court ordered discovery. They were also sanctioned with attorney's fees and costs for the plaintiff's motion for sanction proceedings.
- Facts: The defendants were contractors for the plaintiff. They resigned in 2014 to work for a competitor. In the following days after their resignation, about 1,300 contractors who worked on one of the defendants team at FFS, also resigned to follow the defendant to the competitor. The plaintiffs sought e-mails and text messages sent before and after critical meetings that the defendants hosted at their home on the day of their resignation, in order to prove that the defendants violated their contractor agreement by inducing this defection.

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First Financial Security, Inc. v. Lee

- Facts: The defendants repeatedly denied having any additional responsive communications to produce. However, whenever they were prodded for more documents by a magistrate judge's order, they were able to produce more e-mails and texts. Eventually, the defendants admitted that they accidentally lost thousands of texts. When FFS requested spoliation sanctions from the magistrate judge, they were refused. The magistrate found that the lost text messages may have been destroyed intentionally but not necessarily in bad faith.
- Subsequently, the district court 'approved the imposition of adverse inference instructions for the defendants' failure to comply with discovery and allowed the jury to infer that the defendants instructed their team to come to their home and recruited the sales contractors to defect with them to their new company.' FFS was also awarded their costs and fees for both of their motions to compel against the defendants and their former counsel.

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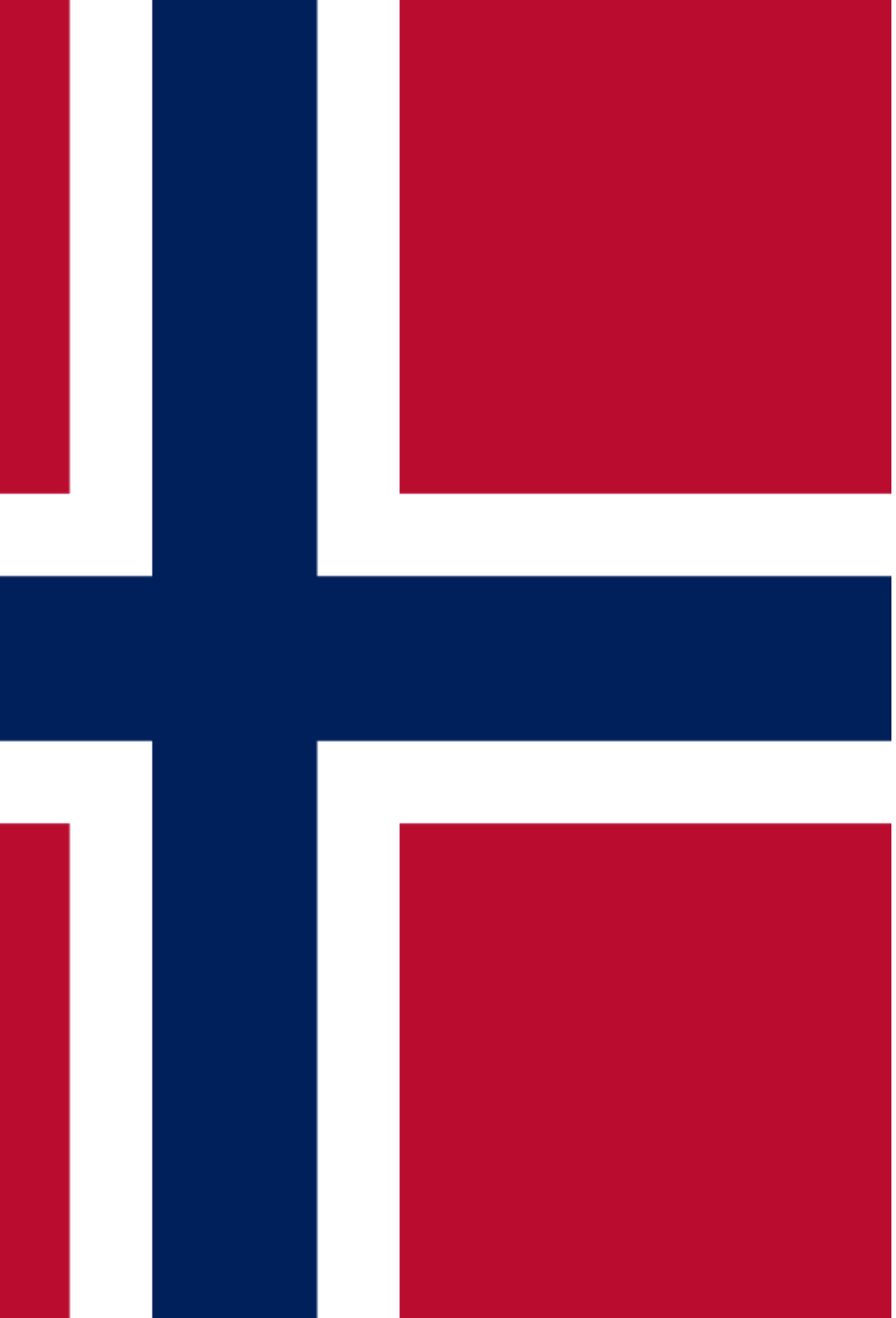


First Financial Security, Inc. v. Lee

Observations:

- The district court concluded that the defendants willfully violated discovery orders.
- The defendants failed to satisfy the court that experienced smartphone users could not locate text messages on their phones.

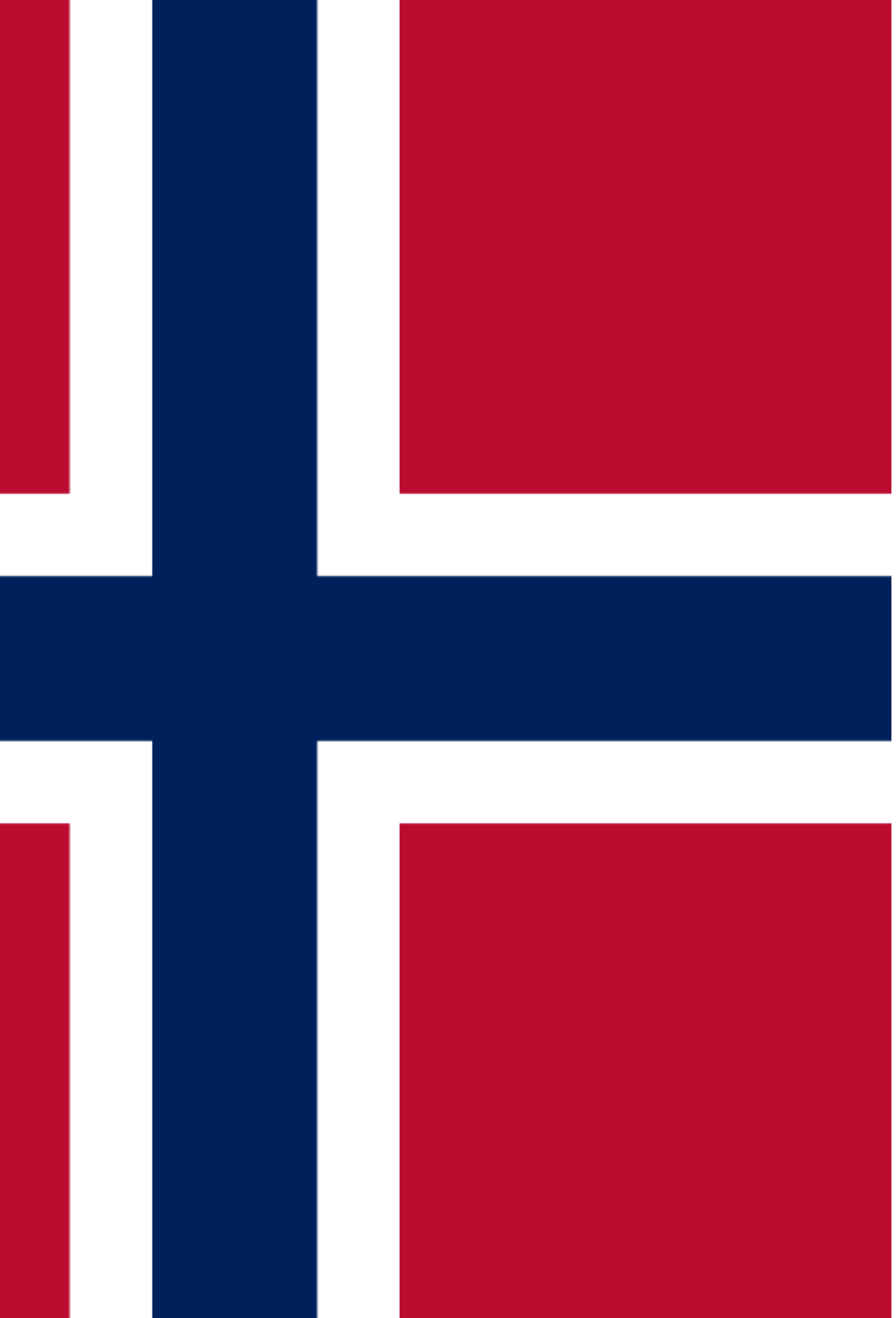
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Ewald v. Royal Norwegian Embassy

- Issue: Are text messages and voice messages on a company-issued cell phone discoverable?
- Ruling: 'The plaintiff was entitled to discovery of text messages and voice messages contained on a company-issued cell phone of the defendant's employee.'
- Facts: The plaintiff alleged employment discrimination against the defendant. The plaintiff applied for the position of Higher Education and Research Officer with the defendant. The defendant also posted another position at the time. The plaintiff was told that the two positions offered the same salary and benefits, that the two positions were considered "parallel positions" and that the officers in those positions would work as a team. Based on the defendant's representations, the plaintiff accepted the offer as Higher Education and Research Officer and relocated from Norway to Minneapolis. Mr. Anders Davidson was subsequently hired as the Innovation and Business Development Officer.

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Ewald v. Royal Norwegian Embassy

- Facts:
  - The plaintiff contended that she was discriminated against based on her gender and alleged several differenced in the Embassy's treatment of her and that of Mr. Davidson. Among other challenges, the plaintiff challenged the defendant's failure to produce text messages. The plaintiff successfully demonstrated the relevance of certain devices and information and that the burden of production did not outweigh the likely benefit. The court reversed the Mag. Judge's order in part and entitled the plaintiff to discovery of relevant and responsive text and voice messages from her work-provided mobile phone, along with any relevant and responsive text and voice messages from Gary Gandrud's work –provided mobile phone.

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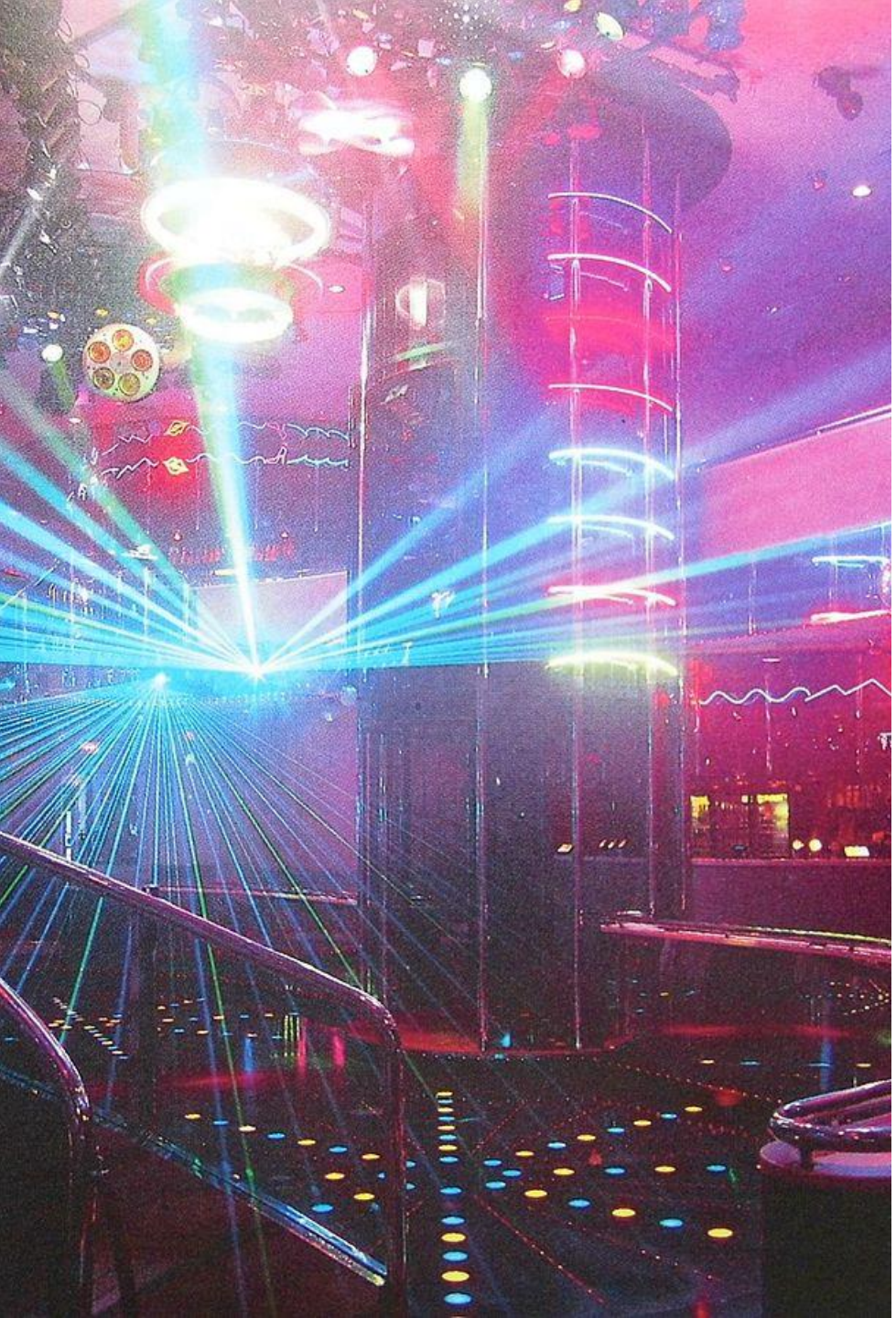


Ewald v. Royal Norwegian Embassy

Observations:

- The court rejected the defendant's argument that it was unaware of its obligation to produce text messages for the following reasons:
- "[i]t is no surprise to any of the parties in this case that there were tablets, text messages, cell phones and laptops involved.
- All of these devices were known prior to the initiation of litigation, and it is common knowledge that ESI is contained all of these devices."

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Christou v. Beatport, 2013 WL 248058, (D. Colo. Jan. 23, 2013)

- Issue: Will the court grant sanctions for the failure to preserve text messages on a smart phone, despite receiving a preservation notice?
- Rule: Courts may sanction parties that fail to preserve relevant text and instant messages.
- Facts: The plaintiff owned several nightclubs with national reputations as venues for electronic music. Bradley Roulier, one of the defendants, formerly booked acts for the nightclubs. Roulier left the club and started a competing nightclub. The plaintiff then filed a suit against Roulier arguing that Roulier was utilizing his influence as the founder of his website to discourage top acts from performing in the plaintiff's nightclubs. Once the suit was filed, the plaintiffs asked the defendants to preserve potentially relevant documents, including text messages. However, the defendants failed to preserve any text messages on Roulier's iPhone and failed to produce any text messages in response to the plaintiff's first discovery requests. Subsequently, Roulier lost his iPhone containing all the text messages. The defendants had a duty to preserve the text.

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Christou v. Beatport, 2013 WL 248058, (D. Colo. Jan. 23, 2013)

Observations:

- As a sanction, 'the plaintiffs were permitted to introduce evidence at trial that the defendants had failed to preserve the text messages and argue that the jury should draw an adverse inference from this failure.'
- It is important to be aware that not only text messages are generally recoverable. Emails can also be recoverable even if they are "deleted" from the user interface on the phone.
- Smartphones can be used by the parties in litigation to store many relevant ESI.

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Key Takeaways

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Key Takeaways

- Counsel should advise their clients about preserving ESI, whenever a client anticipates litigation or when they become a party to litigation.
- Counsel must have an understanding of their client's retention policies for text messages and instant messages.
- Counsel should also understand any challenges with preserving and collecting such information.

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Key Takeaways

- Where texts need to be produced, counsel should consult with their clients to ensure that the key custodians subject to a legal hold, preserves text messages and instant messages on company devices.
- Furthermore, counsel should consult with their clients to confirm that the key custodian subject to legal hold, turn off any automatic deletion feature so that the text messages and instant messages are preserved.

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Questions?



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Judge Leo M. Gordon has served as a judge of the United States Court of International Trade since March 2006. Judge Gordon is responsible for resolving judicial disputes involving challenges to the administration and enforcement of the federal customs and international trade laws by principally U.S. Customs and Border Protection, the U.S. Departments of Commerce, Agriculture, and Labor, and the U.S. International Trade Commission. In addition to his judicial duties, Judge Gordon has chaired, at different times, the Court's Rules, Budget, Public Affairs/Education, and Strategic Planning Committees. Judge Gordon began his career in 1977 as Assistant Counsel at the Subcommittee on Monopolies and Commercial Law, Committee on the Judiciary, U.S. House of Representatives. In that capacity, Judge Gordon was the principal attorney responsible for the Customs Courts Act of 1980 that created the U.S. Court of International Trade. He also had responsibilities involving a wide range of antitrust and other commercial law legislative projects.

Judge Gordon is a member of the Board of Directors for the Federal Judges Association ("FJA"), serves on its Executive Committee, and co-chairs the Association's Benefits Committee. Judge Gordon is also a member of the Board of Directors for the Federal Judges Association ("FJA"), serves on its Executive Committee, and co-chairs the Association's Benefits Committee.

Judge Gordon is a Fellow (Miembro de Numero) of the International Customs Law Academy ("ICLA"). He has addressed the annual meeting of the ICLA in 2012 in Cancun, Mexico speaking on the "Resolution of Customs Disputes in the United States in the Digital Age," and in 2014 in New York speaking on "The U.S. Court of International Trade and Its Role in U.S. Customs Law." Judge Gordon is also a Director of the Academia de Intercambio y Estudios Judiciales ("AIEJ") (The Academy for the Interchange and Study of Judicial Matters) based in Buenos Aires, Argentina. Since 2013, he has conducted several judicial training programs for AIEJ in the United States and Argentina. He also played a principal role in the development of AIEJ's training program for 2017 and 2018.

Judge Gordon attended the University of North Carolina – Chapel Hill, graduating Phi Beta Kappa. He received a J.D. degree from Emory University School of Law. Judge Gordon is a member of the New Jersey, Georgia, and District of Columbia Bars.

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Dan Regard is an eDiscovery and computer science consultant with 25 years' experience in consulting to legal and corporate entities. A programmer and an attorney by training, Dan has conducted system investigations, created data collections, and managed discovery on over a thousand matters. He is responsible for the development and implementation of case and matter strategies that leverage technology in litigation and investigations. In addition, he has both national and international experience advising on such issues as eDiscovery, computer forensics, structured data, and information management. Dan is a frequent speaker, teacher, and publisher on issues of eDiscovery.

Prior to founding iDS in 2008, Dan was the national director of e-Discovery for LECG. He was also the national director of Electronic Evidence & Consulting for FTI Consulting, and was an eDiscovery and data analytics team leader in Analytical Dispute Services at

Deloitte & Touche, where he managed multi-national, multi-jurisdictional, and multi-counsel litigation support projects. He began his career as the founder of a nationwide litigation-technology company.

EDUCATION/HONORS

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Elizabeth advises Plaintiffs' attorneys on all aspects of eDiscovery in high-profile mass tort and class action litigations, with notable recent cases including actions related to auto diesel emissions and airbag scandals, the opioid epidemic, aviation disasters, and e-cigarettes. Elizabeth is an ACEDS Certified E-Discovery Specialist, a member of Women in eDiscovery and the Alliance of Women Trial Lawyers, and frequently writes and presents on electronic discovery issues.

Before joining ILS, Elizabeth spent eight years practicing law at Milbank LLP in New York and Los Angeles, where she litigated complex business and securities disputes in state and federal courts. She draws on her defense attorney experience to further ILS' mission of leveling the eDiscovery playing field for the Plaintiffs' Bar.

Elizabeth holds a J.D. from UCLA School of Law and a B.A. from Boston University, and is a member of the California, New York, and Massachusetts bars. She lives in the Greater Boston Area with her husband and two children.

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Melissa has substantial experience representing victims of privacy and data breaches as well as individuals and businesses in consumer and financial cases, serving as a vital asset throughout the class action and complex litigation process. Joining the FeganScott team in 2020, Melissa is one of the key attorneys at the firm's New York office.

In addition to her class action work, Melissa has experience representing businesses and municipalities in complex commercial litigation. She has represented an alternative energy company in an accounting negligence case against PricewaterhouseCoopers, a foreign investment fund in an action against Fidelity National Title Insurance Company, and municipalities in Fair Housing Act litigation against Wells Fargo, HSBC, and Bank of America.

Melissa has also been recognized for her experience and skill in spearheading discovery in complex matters. She was part of the court-appointed teams that oversaw offensive discovery and ESI issues in In re Apple, Inc. Device Performance Litigation (N.D. Cal.) and In re Equifax, Inc. Customer Data Breach Litigation (N.D. Ga.). In early 2020, Legal 500 named her a "Next Generation Partner" in eDiscovery. Melissa was one of only three lawyers — and the only plaintiffs' attorney — to receive this honor.

Prior to joining FeganScott, Melissa was a partner at a boutique litigation firm in New York and at Milberg, a national class action firm. Before that, she was an associate for a securities litigation firm in its New York, NY and New Orleans, LA offices.

Melissa earned her Juris Doctor from Tulane University Law School, where she was on the Moot Court Board and served as a Senior Fellow for Legal Research and Writing. She also attended UC Berkeley Law School where she was on the California Law Review and received High Honors in Securities and Class Action Litigation. She earned her Bachelor of Science in International Affairs from Florida State University, where she was a Florida Academic Scholar and completed the "Degree in Three" program.

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