

Jaffe, Jonathan

From: Jaffe, Jonathan
Sent: Friday, November 17, 2006 1:52 PM
To: 'Kelber, Tamar B.'; Huey, Nathan A.; Miller, Rodney K.
Cc: Camp Bailey (cbailey@bpblaw.com); Fletch Trammell (ftrammell@bpblaw.com); Jensen, Keith M. (kj@kjensenlaw.com); John Driscoll (JDriscoll@brownandcrouppen.com); Kenneth Bailey (kbailey@bpblaw.com); Kenneth W. Smith (KSmith@AWS-LAW.com); Larry Roth (LROTH@roth-law.com); Lawrence J. Gornick (lgornick@lsgk-law.com); Mike Perrin (MPerrin@bpblaw.com); Pederson, Mike; Pennock, Paul; Pete Schneider (pschneider@gsnlaw.com); Schultz, Laurie
Subject: Production Requirements for the Inital Production

In response to our conversation today, in reviewing the 6 DVDs of the inital production, we have some requests (in order of importance):

1. There is no OCR; therefore, the files are not in a searchable form. We would need a corresponding OCR file for each image.
2. The documents are multi-page TIFFs. We need single page TIFFs. Many documents are thousands of pages and hundreds of MBs large.
 For example: the document on Disk5-NDA 20-639 under "Original Submission\Published Submission\1996-07-29(29Jul96)\v0000192-217.tif" is 8667 pages, **202MB**, and took 5 minutes to open on a high-end workstation. The same document might not be able to be opened on the average laptop.
 Another document, in Disk2-NDA 20-639\Amendments & Supplements\2002\12 (December)\2002-12-30 (30Dec02) 1\Published Submission\N20639\clinstat\other is over **1GB**. In other words, **8% of data size of the entire production is contained in one document**. On our high-end workstation, we could not even open this document.
3. There are Bates numbers stamped on the documents, but neither the names of the files, the labels on the discs, nor the folders indicate the Bates ranges. Documents should be named corresponding to their starting Bates number.
4. There is no load file, and although we can surmise the Bates numbers and based upon the folder and document names some general information about each document, this is not consistent. We request a load file with the single page TIFFs specifying:
 - o Bates number
 - o Start of Document
 - o Path to Document Image on the DVD
 - o Path to OCR file on the DVD
 - o Category
 - o Document Name
 - o Date
 - o if the document is electronic, if available:
 - Date Created
 - Date Last Modified
 - Last User to Modify
 - Author (user who created the document)
5. The load file can be in any text format, but preferably comma separated values.

The initial production totaled 14.1 GB, 8,928 files in 4,528 folders.

You indicated in today's conversation that you would provide the cost and time to meet the above requirements.

Clearly, we will need to sit down and discuss each future production before any documents are produced. In general, the subjects we will address in future discussions will be:

- Whether the production will involve digital images or native electronic format
- How to index the particular production to identify Bates ranges, categories, dates
- How we can ensure the production will be in a usable, searchable format

Of course, these are just some preliminary issues to discuss at future meetings.

Thank you,

Jonathan Jaffe
Manager of Software Development
Weitz & Luxenberg, P.C.
212.558.5522