

# The eDiscoveryJournal Report:

## Legal Holds for Enterprise Archives

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## Introduction

This research paper explores the process of creating and documenting a legal hold initiative on an enterprise archive or content management system. Placement of defensible legal holds is essential before expiring the vast quantities of non-record content that are pouring into your digital landfill. This paper explores potential strategies, issues, best practices and documentation templates.

## Defining the Pain

Many corporations rely on email and file system archives to preserve ESI. However, turning on Exchange Journaling or proactive PST migrations are just the first steps. In order to actively expire non-records and delete Electronically Stored Information (ESI), the corporate legal department needs confidence that any ESI potentially relevant to all their active matters has been placed under legal hold. Without this assurance, the potentially intelligent corporate archive becomes merely an ever expanding storage repository, hindering expiration policies and raising the risk and cost of legal compliance.

## Storage

The volume of corporate email and related communications continues to grow year after year. Corporations managed communication storage by forcing users to either delete emails or move them to offline storage containers such as the Microsoft Personal Storage Table (PST) file. This transferred the storage to relatively cheap, unstable local drives from expensive, redundant network storage. This coping method also made consistent records designation and retention almost impossible. It turned corporate citizens into communication hoarders as they struggled against mailbox limits. Instead of reducing the overall volume of email and files, these policies actual forced users to make multiple copies scattered across laptops, network shares and other offline media. With overall ESI growing at 40+% per year according to some sources, it is easy to understand why many corporations are starting to re-evaluate their early infinite retention policies adopted to mitigate the risk and complexity of actively expiring non-record ESI.

## Discovery cost

The sheer cost for corporations to preserve, collect, process and review all this ESI has become one of the strongest motivations to reassert control of their global information assets. The 2006 amendments to the Federal Rules of Civil Procedure recognized ESI as evidence and set forth new legal requirements that raised the risk and cost of discovery. The highest priority discovery obligation of most corporate counsel is the preservation of potential ESI in matters. The vast majority of published discovery sanctions have involved spoliation or failure to properly collect potential evidence. Many corporations with high litigation profiles or regulatory requirements invested in enterprise archives or other content management systems to enable global preservation through Exchange Journaling or other automatic versioning mechanisms. This managed their risk, but results in a digital landfill without a documented, defensible legal hold process.

## Confidential information

Buried within every matter collection is the “keys to the corporate kingdom”, meaning critical corporate confidential information that needs to be marked for treatment under a protective agreement. Any search for custodian names will retrieve HR spreadsheets with every employee’s title and salary information. Any search for customer names will retrieve your price lists. The list goes on, but the key point here is that the sheer size of search results makes it increasingly diffi-

cult to protect your corporate trade secrets and confidential information. The relevance review process will weed out some or most of these as being not relevant to the matter, but no review is 100% effective. Expiring early versions and copies of these sensitive files, emails and attachments reduces both risk and cost to control the leakage of your corporate information to your competitors.

## Solution Strategies

So how do we actually get rid of non-record communications and other ESI? Traditional records management systems forced users to periodically box up paper records, assign record categories and sent to offsite storage. The user approved a destruction notice when the box reached retention expiration to have a documented destruction process. This worked fine when the paper volume was manageable and the user actively threw out anything that was not a 'record'. Email volumes are not really manageable, forcing users to either frantically file email in folders or rely on searches to find critical email. Even 'filers' generally do not organize their Sent or Deleted items, which may need to be preserved in some matters or for regulatory compliance.

## Categorization

The latest version of Exchange cannot hold unlimited email without serious performance and stability issues. To address this need, Microsoft Exchange 2010 introduced a secondary 'Archive' mailbox attached to the primary user mailbox. It is unfortunate that they broke the single instance storage on Exchange databases at the same time, eliminating potential storage savings. The volume in a power user's mailbox can exceed normal mailbox limits in a remarkably short time period. In order for the archive or email platform to keep communications for the proper time period, they must be assigned a retention category, either by the user or by a system of rules.

## User designation

User driven categorization is the dominant categorization mechanism in the market. Many systems rely on users moving emails into a retention folders. Others use a retention tagging mechanism, force categorization upon creation or require the user to move records out of the communication platform entirely. All of these systems require a conscious decision by the user to define a record. This tends to reduce the volume of records while increasing the need for training and compliance monitoring to prevent some users from just disregarding the process or bulk categorizing everything for infinite retention. The primary disadvantage of user designation is the time and attention that this takes away from the user's real jobs.

## Rule based

There have been many systems that have promised automated, rule-based retention categorization throughout the last decade. Few have managed to deliver acceptable quality and consistency without a major investment in skilled, dedicated personnel to define and constantly tune the rule filters. That does not mean that automated categorization cannot offer value and play a vital role in retention management. A surprisingly large portion of communication traffic can be categorized by rules or one of the new 'smarter' systems that dynamically learn from user designations. It is the critical minority of oblique language or indirect communications that these systems tend to struggle with. When used carefully, auto-categorization rules can lift the majority of the user burden by pre-categorizing the majority of communications, including Sent/Deleted items.

## Expiry

The point of categorizing ESI is to automatically delete non-record, extemporaneous communications and ESI as soon as possible. This keeps the corporate IT infrastructure lean and reduces discovery risks and costs as discussed above. Some expiry systems require periodic user approval prior to disposal, but this can be very burdensome to employees unless ESI is already culled in the initial retention categorization process. Others have a 'dumpster' function that enables administrators to retrieve 'expired' items for a limited time window. The majority of systems delete expired items on a nightly basis unless those items have been protected by one or more legal holds. The largest challenge for most corporate legal departments is to define the criteria and scope of holds for all matters and apply these to the existing ESI sources. Until the legal department has completed this legal hold initiative, they cannot allow IT to expire ESI that might be potentially relevant to matters. This means that the ESI will continue to accumulate within active and archive systems until Legal is confident that they have protected existing ESI and will automatically protect new ESI as it is created.

## Active Purge

Some methodologies rely on users or records management personnel to periodically search, review and actively designate expired items. This method lends itself to highly regulated industries that require a high level of sophistication and documented diligence around their data lifecycle. Some companies may require users to 'clean up' their own sources, but many users will not have the proper rights or technical know-how to effectively locate and purge ESI in a consistent manner. This means an increased commitment to training, monitoring and possibly third party audits to demonstrate reasonable effort.

The primary concern for all retention methodologies is that an unenforced or inconsistently applied retention policy can be worse than no policy when it comes to discovery. A sharp plaintiff counsel can make arguments that could force you to produce the archived records and still collect, process and review all custodial local sources based on the probability that ESI exists on the local that is not in your record repository.

## Legal Holds

So what stops corporations from implementing an enterprise archive or content management platform and cleaning house? The roadblock is usually the effort to identify ESI that has to be preserved for pending litigation or regulatory requirements. Regulatory agencies are slow to change their retention requirements and most regulated corporations have legacy protocols from the paper days that have encouraged users to folder, print or otherwise group these kinds of documents. Moreover, they tend to have relatively static profiles (same names, footers, titles, etc) that lend themselves to rule engines. So the real obstacle tends to be the creation of a centralized legal hold workflow that can be applied to your archive/ECM system. All of this presupposes a default business retention period and categorization of existing records in user or central archives. Fundamental retention policy and implementation is beyond the scope of this paper, but many corporations can use a generous default business record retention period to clean up archives when holds are in place.

## Removing the legal roadblock

So what does it take for your counsel to feel confident that their potentially relevant ESI is protected? The legal standard is ‘reasonable effort’, not perfection. Every matter can result in different requirements, but only your counsel can decide what is ‘reasonable’. That being said, corporate litigation tends to fall into patterns and the company’s standard protocol should be based on the predictable requirements. Exceptional cases such as fraud or other criminal matters can be handled on an ad hoc basis.

### Legal Hold Checklist for Expiry:

- ✓ A defined, documented process administrated by the appropriate personnel
- ✓ Quality control and assurance to catch systematic non-compliance
- ✓ Validated technology that automates as much of the hold process as possible
- ✓ Custodian feedback and agreement mechanisms that actively update your hold scope
- ✓ Clear, simple disclosure documentation that explains the hold process and known exceptions
- ✓ A list of accessible and inaccessible ESI sources
- ✓ Holds placed on all managed ESI
- ✓ Hold notices sent and acknowledged by all matter specific custodians and system administrators

## Reducing the risk of expiry

The above tasks reduce the risk that potential evidence will be deleted when expiry is enabled on your archive/ECM systems. Remember that the standard is reasonable effort rather than absolute perfection. In any system large enough, there will be unsearchable data types, phantom custodians, data losses and legacy systems that may comprise known and unknown exceptions. Validation testing using samples of known file types and quality control sampling can demonstrate your diligence and provide you with the necessary list of known exceptions.

## Decisions and strategies for placing holds on archives

The ESI sources and architecture of your archive/ECM system will shape the scope and methodology of your legal holds. Your ESI systems and sources may be organized by custodian, business unit or as global repositories such as Exchange Journal archives. Understanding how the data is stored, searched and retrieved is critical to deciding on how holds will be placed, amended and released. You should walk through a typical matter lifecycle from the first decision to enact legal holds, the negotiated discovery requests and your criteria for releasing holds when the matter is resolved. At each phase, define the action to be taken and what information you usually have to base your hold criteria on. For example, at the first notice and decision to enact the legal hold, corporate counsel may only know the business unit, rough time of the initiating incident and a handful of key custodian names. If counsel knows the typical lifecycle of critical ESI sources such as the email Journal archive and backup tapes, that tells them how long they have to conduct Identification interviews and searches to better define the reasonable scope of the initial hold. The reasonableness standard should be used to balance the effort/cost required to



place overly broad global holds against the realistic risk that ESI might be lost during the initial Identification actions.

## Matter vs. Global Hold List

Most companies manage their legal holds strictly by individual matter. This is easy to understand, document and defend, but it can dramatically increase the actual effort, scope and even storage related to legal holds if there is a high level of criteria overlap between matters. Some archive platforms must create a separate copy and reindex all items under a specific matter hold. Others simply track overlap on a database level, which minimizes the system impact of overlapping matters. Matter based holds can be released individually without having to worry about other matters, but it can be challenging to get an overview of your ESI under hold. It is recommended that you maintain a global hold list or be able to run aggregate reports from your systems so that legal and IT can understand the scope and nature of all holds. If you decide to rely on a global list of custodians on hold without matter, chronological or criteria filters, you should carefully document the process of requesting new custodians, tracking all matters per custodian and releasing holds. In general, granular matter based holds will minimize the volume and cost from non-relevant ESI within your archives.

## Who – Custodial Holds

The potential discovery in many matters can be based on custodian ownership or contact with the ESI. This has shaped the current dependence on legal hold notices that require custodians to actively preserve potentially relevant ESI. This worked well when ESI resided on primarily local drives, email mailboxes, home directories and network shares. User ESI has outgrown these unstructured repositories and this report assumes that your corporation has or will utilize an enterprise archive or content management system to centralize, search and expire user ESI. This shifts the primary burden of preserving ESI from the user to the corporate legal or IT group. If all your archives are organized based purely on custodial ownership, it can appear to be a simple matter to disable expiry on those archives. However, this only works if user archives contain all emails/ESI. Most archives give the users 30+ days to delete non-records and organize/categorize record email prior to being moved to the archive. Others archive everything under a default retention category and then allow users to update that category later. You must understand what is in your user archives and whether unique emails or files relevant to users could exist in other user's archives. In most cases, an all archive search for custodial ESI is the most comprehensive method of preservation.

Before relying on custodial hold criteria, you should understand how custodial names/UserIDs are resolved within your enterprise/email systems and perform documented validation tests to demonstrate a reasonable confidence that your custodial searches are effective. Every enterprise communication and file architecture is unique and has changed over time. Email addresses, display names and file properties will vary over time based on mergers, business units, reorganizations and system upgrades/migrations. Reasonable diligence is dictated by counsel, but you should be able to use prior collections and known sample sets of your ESI to run test searches to validate your hold criteria.



## Common Custodial Hold Issues:

- Mergers and acquisitions that involved migrations from Lotus/Exchange
- Default File Owner/ModifiedBy properties that use the company name
- Display name variations due to marriages, personal contacts and system upgrades
- Distribution lists that have not been expanded to include the individual names
- Migrations of file ESI or emails that overwrite ownership
- BCC information lost
- Non-email communications types such as Tasks, Calendar items, Notes, IM and PIN messages

## When – Chronological Hold Criteria

Some matters have a known relevant time frame that can be used to limit the scope of holds. The most important time question is whether the relevant time frame cuts off when the matter is filed or whether the corporation has an ongoing duty to preserve all newly created relevant ESI. The latter may require updating filter rules or running scheduled searches that will regularly place new items on hold. Depending on the breadth of the scope, it may be advisable to enable Exchange/Domino Journaling on all matter custodians for ongoing preservation of all sent/received email. Remember that this will not capture any actions that take place within the actual user mailbox, such as moving an email into a specific folder or creating a Note. Also remember that some item types do not have an actual date field or the date fields may be effectively useless due to system migrations.

## What – Search Term Hold Criteria

Matters such as IP infringement, discrimination, employment practices and others may require holds based on search terms, phrases, email domains and other non-custodial criteria. These holds represent the greatest opportunity to limit the relevant scope as well as the greatest potential risk to inadvertently miss critical ESI. You must build a documented, defensible process when defining matter search terms to minimize this risk. There are several approaches to defining term lists that are specific and comprehensive.

- Profiling known relevant initial collections
- Sampling for false positives and negatives based on primary custodians
- Term frequency reports on search results and on known relevant manual collections
- Statistical analysis of trends within search results based on chronological, attachment types, custodians and other data facets to spot gaps
- Iterative manual reviews of search results to extract common positive and negative term/phrase patterns
- Exchange of proposed search criteria with frequency reports for mutual review and acceptance
- Third party expert analysis of high stakes matters or extremely complex ESI formats
- Sample analytic analysis with conceptual, content clustering and other visualizations/reports
- Automated relevance criteria training systems based on manual review of samples

## Known Search Term Issues:

- Non-textual attachments and embedded objects
  - Audio/Video
  - Graphics
- Foreign languages
  - Double-byte and other non-U.S. character sets
- Encryption/Passwords

## Exceptions and Declarations

One of the strongest defenses is the proactive declaration of known exceptions, data gaps, inaccessible sources and anything else that your hold might not encompass. You should create a standardized, plain language declaration.

## eDiscovery Declaration Components

- Known ESI systems
- Known ESI storage sources
- Known ESI formats
- Chronological coverage by ESI system
- Scope of archive coverage – users vs. journaling
- Preservation/Retrieval capabilities with examples and known limitations
- Total estimated volumes of ESI for last survey date range (example – 5 TB of email as of 12/31/2010)

## Journal vs. Custodial archives

Although we have already discussed some of the implications of archiving directly from user mailboxes or Journal capture of messages, it is worth a more detailed examination of the potential impact on your legal hold process. The different capture mechanisms result in very different archive content.

<b>Mailbox Archiving</b>	<b>Journal Archiving</b>
Typically archived after 30-60 days Multiple copies archived from user mailboxes User designated Retention category Only capture items not deleted by user Unique User actions: <i>Folder location</i> <i>Read/Unread Status</i> <i>Forward/Reply Information</i> <i>Flags/Tags</i> Non-message items: <i>(depends on archiving rules)</i> <i>Local calendar events (non-invites)</i> <i>Tasks</i> <i>Notes</i> <i>Contacts</i>	Archived immediately on send/reception Single copy captured during transport Rule driven Retention category (if not default) 100% sent/received capture No user action information

So what does this mean for your legal holds? Holds on Journal archives must be applied by some form of search criteria, the more selective the better. Holds on user archives can be applied by Legal Holds for Enterprise Archives

search as well, but be aware of the types of archived items that may not respond to custodial criteria such as unsent calendar events, tasks, contacts and others. These items are not relevant to many matters, but counsel will need to make that determination. If they are relevant, then you may have to execute a second hold search based purely on the target user archives or use object type criteria. Some archive systems apply holds on an entire user archive through an administrative property change. This mechanism may require you to track existing custodial archive holds through your matter management system or at least with a central spreadsheet/database.

## Getting buy in from inside/outside counsel

Both corporate and law firm counsel on a matter must have confidence in the scope and hold process before they will authorize the corporation to begin expiring ESI not under hold from the Journal or user archives. For your existing matters, this may mean submitting proposed scope criteria such as custodians, dates, search terms and other facets to outside counsel for input and approval. Appendix X includes a sample notice and criteria form as an example of this process. This assumes that your outside counsel has already conducted some level of Identification interviews and may have already reviewed initial core ESI. Although it can be tempting to place complete responsibility for the scope definition on your outside counsel, no one knows your ESI better than you do. Active, consistent analysis of matter scope will enable you to minimize both the scope and risk associated with holds.

## Quality Assurance and Documenting the process

Once you have a defined scope for a matter, your litigation support or designated case managers should execute your hold searches/actions on your managed sources. Application of enterprise wide searches and holds is rarely an instantaneous process. Your system should report any errors, but you will want to include validation tests for common network, storage and other issues that could interfere with a search or hold action before relying on error reporting. Beyond system or network issues, your personnel should perform quality checks on the items under hold before logging the matter successfully under hold. This can include generating frequency reports on email addresses, chronological distribution, attachment types and other data facets looking for gaps and missing custodians. Selective sampling and review of actual search items can provide additional assurance that the scope criteria was appropriate. If you are using search terms or other filter criteria, then sampling items not under hold can be recommended, but only where the items are at least possibly relevant, such as other custodial email.

Your archive system may have a full discovery workflow and interface that documents your hold actions and decisions. If not, you may need to track your actions within your matter management system. Fundamentally, you should be able to reconstruct the who, when, how and what of all hold actions to defend your overall preservation process. The easiest way to do this is to create a list of primary action points and make sure that you know where each action will be documented and how it can be reported on. Documenting all actions in one system seems obvious, but may not actually be practical or easy.

## Example Legal Hold Action List:

1. Hold Decision
2. Matter Creation – matter management system and Matter ID generated
3. Hold Scoping
  - a. Interviews
  - b. Investigative Searches/collections
  - c. Scope definition
4. Execute holds/searches on archives
5. Quality Control/Assurance on Holds
  - a. Update Holds if needed
6. Hold Notifications to Matter and System Custodians
7. Ongoing Holds/searches created if needed
8. Periodic hold scope check – as needed
9. Matter closure authorization
10. Archive holds released
11. Release notices to custodians

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## Appendix 1 – Matter Hold Form – Outside Counsel

### CompanyX Legal Hold Form

#### **MatterID – Matter Name**

As outside counsel on the matter(s) referenced above, we are requesting that you assist in creating and updating the appropriate Legal Hold preservation scope criteria and instructions. The primary focus is for searches to be run within the corporate email archive system, [Archive Name](#).

Please keep in mind that the scope criteria is intended to identify Electronically Stored Information (ESI) potentially relevant to the matter without being overly broad and created an unreasonable burden. We want to make a reasonable and good faith effort to preserve what we know to be potentially relevant.

Email is searchable by custodian names, date range and words/phrases within the email and attachments. In order to reduce errors and support a consistent work process, we have attached an Excel workbook to help format and import the preservation criteria into our system. Where key custodial or other information is already known, we will have pre-populated the appropriate worksheets. You should review and modify any supplied criteria.

The custodial names will be searched against the words/phrases unless specified in the Overview sheet. The system can search for emails specifically within a list of names. This means that one of the names must be an author and one of the names must be in the recipient fields. This is a very narrow way of searching for Conversations within a group.

The system does not automatically search for all variations of search terms. You can use the Boolean AND as well as other connectors, but should probably speak with the search team to make sure that we understand your syntax. Phrases can be enclosed in double quotes.

One of the most important issues is whether the matter requires ongoing preservation. Most civil litigation cuts off discovery at the date that the case was filed. Ongoing preservation places a significant burden upon the corporation.

Beyond the archived email, you should indicate the scope of preservation required for any of the following ESI locations:

- User Mailbox (only required for email within the last \_\_ days)
- Local PCs and Laptops – Supply separate search criteria or indicate if email criteria can be used
- Custodial User Shares - Supply separate search criteria or indicate if email criteria can be used
- Network Departmental Shares – specify search criteria or other descriptors to identify specific shared folders
- Structured Data and Systems – Indicate which systems (financial, operational, etc) and any criteria that can be used to limit the scope.
- Mobile Devices –
- Other ESI

## Appendix 2 - Matter Hold Criteria Questionnaire

### Overview

Question	Answer	Comment
Matter Number		
Matter Name		
Completed By		
Earliest Date		
Latest Date		Default to date matter filed
Ongoing Preservation		Yes/No
User PC/Laptop		Criteria?
Forensic Capture?		Yes/No - Please confirm with Inside Counsel
User Share		Criteria?
Network Share		Criteria?
Names & Terms		Yes/No - names will be searched against list of terms
Conversations		Yes/No - requires names in Author and Recip
Special Instructions		Describe specific Boolean or other search conditions for criteria

### Custodians/Employees:

First	Last	Initial	Abbrev1	Abbrev2	SMTP	UserID	Search String
John	Doe	M			<a href="mailto:Jdoe@CompanyName.com">Jdoe@CompanyName.com</a>	Jdoe	John.Doe Doe.John John.M.Doe Jdoe@CompanyName.com Jdoe

### Outside Custodians:

First	Last	Initial	Abbrev1	Abbrev2	SMTP	UserID	Search String
Jane	Smith	K			<a href="mailto:Jane.Smith@gmail.com">Jane.Smith@gmail.com</a>		Jane.Smith Smith.Jane Jane.K.Smith Jane.Smith@gmail.com

### Terms & Phrases:

Term/Phrase	Comments/Variations
Term1	
Term2	
Term3	
"Phrase One"	
Term4 NOT Term5	