

# EXHIBIT "D"

1 Ryan K. Yagura (SBN 197619)  
2 *ryagura@omm.com*  
3 Kevin Murray (SBN 275186)  
4 *kmurray2@omm.com*  
5 O'MELVENY & MYERS LLP  
6 400 South Hope Street  
7 Los Angeles, CA 90071  
8 Telephone: (213) 430-6189  
9 Facsimile: (213) 430-6407

7 Michael J. Lennon (*pro hac vice*)  
8 *mlennon@kenyon.com*  
9 KENYON & KENYON LLP  
10 One Broadway  
11 New York, NY 10004  
12 Telephone: (212) 425-7200  
13 Facsimile: (212) 425-5288

14 *Attorneys for Defendants*

15 **UNITED STATES DISTRICT COURT**  
16 **CENTRAL DISTRICT OF CALIFORNIA**

17 SIGNAL IP, INC.,  
18 Plaintiff,  
19 v.  
20 VOLKSWAGEN GROUP OF  
21 AMERICA, INC., *et al.*,  
22 Defendants.

23 **Case No. CV 14-03113 JAK(JEMx)**

24 **[PROPOSED] ORDER REGARDING**  
25 **ELECTRONIC DISCOVERY**

26 The Court ORDERS as follows:

- 27 1. **Electronic Discovery.** The parties shall produce documents electronically as  
28 follows:

1  
2 A. General Document Image Format. Except as specified in Section G below,  
3 each electronic document shall be produced in single-page Group IV Tagged  
4 Image File Format (“TIFF”) format at 300 dpi or in PDF format. TIFF and  
5 PDF files shall be single page and shall be named with a unique production  
6 number followed by the appropriate file extension. An Opticon (.opt) or  
7 IPRO (.lfp) load file shall be provided to indicate the location and unitization  
8 of the TIFF files. Also, a basic .txt or .csv file, or a .dat file with  
9 Concordance delimiters (i.e., a load file) shall be provided to indicate, at a  
10 minimum, the beginning and ending production numbers, the production  
11 volume id, and the number of pages for each document produced (see  
12 Section C below). A document that the vendor was unable to process will  
13 either be represented in the production set with a slip-sheet indicating that the  
14 document was not processed or be listed on an electronic exception report in  
15 a spreadsheet or similar report format.

16  
17 B. Text-Searchable Documents. No party has an obligation to make its  
18 production text-searchable; however, if a party’s documents already exist in  
19 text-searchable format independent of this litigation, or are converted to text-  
20 searchable format prior to production for use in this litigation, including for  
21 use by the producing party’s counsel, then such documents shall be produced  
22 in the same text-searchable format at no cost to the receiving party.  
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28

1 C. Document Unitization. If a document is more than one page, the unitization  
2 of the document and any attachments and/or affixed notes shall be  
3 maintained as they existed in the original document. That unitization shall be  
4 reflected in the load file described in Section A above. For email  
5 attachments, appropriate attachment fields in the load file shall accompany  
6 the beginning and ending production numbers for the email.  
7

8  
9 D. Footer. Each document image shall contain a footer with a sequentially  
10 ascending production number.  
11

12 E. Color. If the need arises to view a particular document in color, a party can  
13 make a good faith request to receive color JPEG images for that document.  
14 No images, including JPEG images, shall be compressed using the LZW  
15 (Lempel-Ziv & Welch) algorithm.  
16

17 F. Extracted Metadata. No party has an obligation to produce metadata  
18 associated with electronic documents; however, the producing party will, to  
19 the extent reasonably possible, preserve any metadata associated with  
20 electronic documents and, upon reasonable request and showing of  
21 particularized need by the requesting party, will produce any available  
22 metadata associated with the electronic document.  
23

24  
25 1) Field names shall be included as the first line of metadata load files.

26  
27 2) Production numbers shall not be more than sixteen characters long or contain  
28 spaces.

1 G. Native Files. A party that receives a document produced in a format  
2 specified above may make a reasonable request to receive the document in its  
3 native format, and upon receipt of such a request and after a showing of  
4 particularized need for the native file(s) by the requesting party, the  
5 producing party shall produce the document in its native format, if  
6 reasonably available. If a document is not formatted in a way that is easily  
7 converted to TIFF format (e.g., database files, large excel spreadsheets), then  
8 the producing party shall have the option of producing the document in  
9 native format.

10  
11  
12  
13 1) Native files shall be named with a production number. All native files  
14 produced shall be accompanied by load files as described in Section A above,  
15 shall include a TIFF placeholder or slip-sheet, and shall include a  
16 “NativeFile” field in a load file that contains the file paths to the native files  
17 produced. The production number naming convention for native files shall  
18 not include a confidentiality designation as part of that filename. However,  
19 the confidentiality designation for a native file, if any, shall be included in a  
20 “Designation” field in the corresponding load file.

21  
22  
23  
24 H. Hard Copy Documents. Hard copy documents shall be scanned and  
25 produced in the electronic format described in Sections A-D above.

26  
27 I. No Backup Restoration Required. The parties agree that, absent a specific  
28 request for good cause shown, no party need restore any form of media upon

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