




SEPTEMBER 18 – 19, 2025

LE MÉRIDIDIEN DENVER DOWNTOWN
1475 CALIFORNIA STREET
DENVER, CO 80202

THURSDAY, SEPTEMBER 18, 2025

8:00 AM – 9:00 AM	BREAKFAST & NETWORKING	
9:00 AM – 10:00 AM	<p>KNOW THY ENEMY: NAVIGATING THE PRODUCING PARTY'S EDISCOVERY PROCESS?</p> <p>Using the EDRM model, this session will delve into the process a party undertakes to identify relevant sources of information, preserve and collect it, process it, review it (for responsiveness and privilege), and produce it. The session will foreshadow technical issues relevant to ESI protocol negotiations, such as directories provided in a production, what processing entails, and the creation of privilege logs using automated processes. Additionally, this session will provide context for our interactions with a party during this process, including disclosures of custodial and data sources, preservation issues, collection with hyperlinks, electronic search negotiation, privilege protocol negotiation, production specifications, and related disputes.</p>	Grove Ballroom Section 1 & 2

10:00 AM – 11:00 AM	<p>ANATOMY OF AN ESI PROTOCOL</p> <p>This rapid-fire session will walk participants through the typical components of an ESI protocol, explaining what each element means and why it matters. We'll cover topics such as decompressed compressed files, password-protected files, the importance of time zone selection, Bates numbering conventions, and more.</p>	Grove Ballroom Section 1 & 2
11:00 AM – 11:15 AM	NETWORKING BREAK	
11:15 AM – 12:15 PM	<p>PROTOCOLS DOS & DON'TS</p> <p>This session will address challenging issues encountered during ESI protocol negotiations, offering strategy and practical advice on how to navigate these complexities effectively. The session will discuss the balancing of issues and the art of effectively picking your battles and knowing when to involve the court.</p>	Grove Ballroom Section 1 & 2
12:15 PM – 1:30 PM	LUNCH & NETWORKING	
1:30 PM – 2:30 PM	<p>NOW WHAT? HOW TO EFFECTIVELY ANALYZE AND TACKLE INCOMING PRODUCTIONS</p> <p>This session will cover strategies for handling in-bound productions, including what to check at the time of production for both substantive and technical sufficiency. Additionally, the session will discuss methods for effectively and efficiently analyze a production when time is short, and longer-term strategies for identifying deficiencies.</p>	Grove Ballroom Section 1 & 2
2:30 PM – 3:30 PM	<p>FOUNDATIONAL DISCOVERY CASE LAW</p> <p>The session will focus on go-to cases for common discovery disputes. It will offer a brief introduction to seminal cases that establish basic principles of</p>	Grove Ballroom Section 1 & 2

	eDiscovery, such as cooperation and transparency, reasonable inquiry, disclosures vs. discovery on discovery, validation, and more.	
6:00 PM – 9:00 PM	COCKTAIL RECEPTION AND WELCOME DINNER Sponsored by 	

FRIDAY, SEPTEMBER 19, 2025

8:00 AM – 8:30 AM	BREAKFAST & NETWORKING	
8:30 AM – 8:45	WELCOME & INTRODUCTIONS	Grove Ballroom Section 1 & 2
8:45 AM – 9:45 AM	THE LATET IN EDISCOVERY: POLICIES, CASES, AND RULE UPDATES	Grove Ballroom Section 1 & 2
9:45 AM – 11:00 AM	DEFENDANTS' PLAYBOOK AND PLAINTIFFS' STRATEGIES	Grove Ballroom Section 1 & 2
11:00 AM – 11:15 AM	NETWORKING BREAK	
11:15 AM – 12:30 PM	VALIDATION: WHAT DOES IT MEAN, HOW IS IT DONE, WHEN IS IT DONE AND WHY IS IT IMPORTANT	Grove Ballroom Section 1 & 2
12:30 PM – 1:30 PM	LUNCH & NETWORKING	
1:30 PM – 2:45 PM	TECHNICAL SESSION: UPDATES ON HYPERLINKS, NON-EMAIL MESSAGING DISCOVERY, AND COLLECTION BEST PRACTICES	Grove Ballroom Section 1 & 2
2:45 PM – 3:00 PM	NETWORKING BREAK	

3:00 PM – 4:00 PM	GENERATIVE AI: NEGOTIATING PROTOCOLS AND TURNING GENAI TO PLAINTIFFS' ADVANTAGE	Grove Ballroom Section 1 & 2
4:00 PM – 5:00 PM	CLOSING RECEPTION SPONSOR TO BE ANNOUNCED	TBD