



# Healthcare Industry

SECOND REQUEST EXPERTISE

*Consilio's integrated discovery services and Immediate Case Assessment™ analysis help a client save as much as \$2.5 million in eDiscovery costs for a second request.*

## THE CHALLENGE

Our team was engaged to provide comprehensive forensic data collection, processing, analytics, hosting, managed document review, production and project management in connection with a Hart-Scott-Rodino (HSR) Second Request relating to a major acquisition for a hospital system. Due to the complexities of the issues and the accelerated timeframe for production, tight integration between our project management and outside counsel was essential to the success of this project, as was the deployment of advanced analytics and tailored document review workflows.

## OUR APPROACH

The project started with the collection and processing over 20 terabytes of data from 45 custodians. Our personnel developed a close working relationship with the client's IT team and a deep understanding of its IT infrastructure.

Once collected and processed, Consilio's Immediate Case Assessment (ICA®) and analytics capabilities were critical to defensibly culling this enormous data set, resulting in removal of 93% of the documents collected prior to review. Our analytics team focused on validating the selected custodian list, uncovering "hot" documents prior to review to aid in reviewer training and creating a defensible search strategy based on comprehensive analysis of search terms.

During the managed document review, our team of over 20 full time employees and 300 review professionals worked almost 60,000 hours to review eight million pages in a three-week period, with no overtime costs incurred by the client. Ultimately, a little over six million pages were produced.

Our project management team worked closely with outside counsel to provide extensive training regarding specific requirements for the project. Outside counsel had also asked us to help identify key documents for depositions from the six million produced pages. During the review, we provided counsel with a daily roll-up of key documents and regular preproduction releases to give them immediate work-product access and real-time visibility into the review. We ultimately identified approximately 5,000 key documents for counsel to review for deposition preparation.

### RESULTS & BENEFITS

Using our ICA process and analytics capabilities, we culled 20 terabytes of data down to eight million documents for review. This process alone saved the client over \$900,000, based on the reduced volume for review. In a three-week period, we then reviewed the remaining documents for timely production while simultaneously screening for key documents for counsel's use in preparation for potential depositions.

After the successful conclusion of the project, the client asked us to conduct an objective analysis of the four other service-provider proposals submitted for this matter, providing copies of the bids with the competitors' names redacted. Using actual metrics from the project, we calculated the cost for each model. The results were staggering: our approach saved the client between \$1 million and \$2.5 million, based on the proposals reviewed.

*Contact Consilio today at [info@consilio.com](mailto:info@consilio.com) to learn how our team can help with your HSR Second Request needs.*