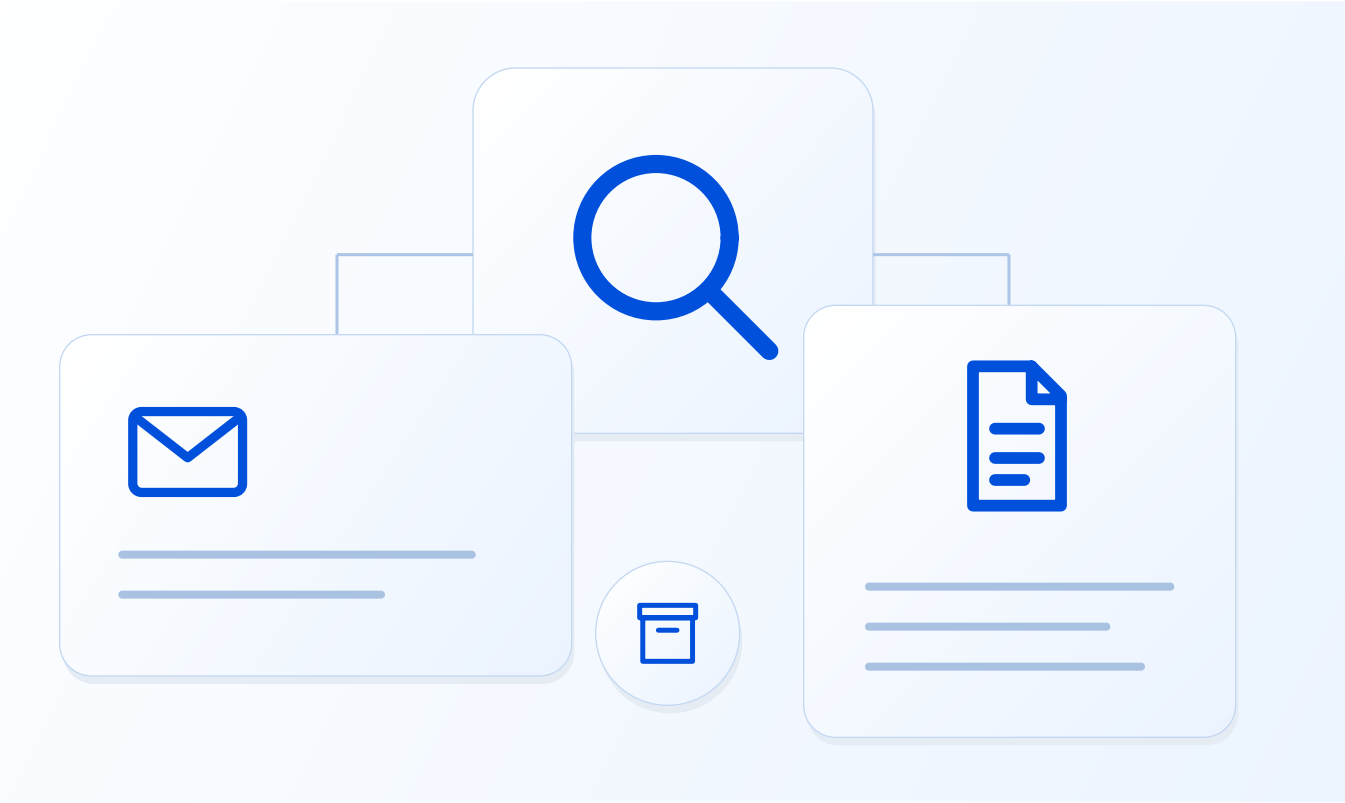
DFI FORENSICS

A GUIDE FOR LITIGATION LAWYERS

From collected data to reviewable evidence

Practical eDiscovery for legal teams



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01 / PLAN THE RESULT

Start with the review you need to conduct

A mailbox export can contain thousands of records and still leave a legal team unable to review the right material efficiently. The useful outcome is an intelligible population, with its sources, relationships and exceptions explained.

Begin with the next decision: which records must counsel assess, what issues should the review address, and how will the receiving team work with the result? A production format chosen after processing can require avoidable rework.

Separate the decisions that shape the result

Preserve and collect	Protect potentially relevant sources, then capture the authorized material. A targeted export is not a complete account or device history unless its coverage supports that description.
Process and review	Prepare supported files for searching and reading. Counsel or the instructed legal review team assesses responsiveness, privilege, confidentiality and disclosure. Processing does not make those legal decisions.
Produce and receive	Deliver the approved set in the agreed form, with enough information for the recipient to load, read and reconcile it. A working review database is not automatically the final production.

These activities can be revisited as the matter develops. The current EDRM model describes an iterative process, with analysis throughout and disposition after use. Treat the model as a planning framework, not a mandatory sequence or a statement of Canadian procedural law. [2]

General technical guidance, not legal advice. Counsel determines the applicable obligations, authority, proportionality, privilege and production requirements.

02 / SOURCE POPULATION

Know what entered the review process

Before searching, reconcile the received material with the intended sources. Identify custodians, accounts, devices, shared locations and periods. Keep an explicit distinction between a collection made for this matter and a folder or export supplied by someone else.

For inherited exports, ask how they were created, which filters were used and what could not be collected. Missing acquisition records are a limitation to document, not a reason to relabel the material as a complete collection.

Preserve the relationships that give records meaning

A message, its attachments and a linked cloud document may arrive as separate items. Retain identifiers that connect them. Track the source container and custodian so a reviewer can trace an item without relying on its filename alone. Identical filenames can describe different files.

Agree duplicate handling before reducing the review view. Removing repeated content from a reviewer's queue should not erase relevant information about where copies appeared. Exact duplicates, similar versions and separate communications carrying the same attachment may require different treatment.

Make exceptions a visible workstream

Encrypted, damaged, unsupported or poorly indexed items require an explicit decision: remediate, review another representation, seek another source, or retain the limitation. An exception is not a finding that the content is irrelevant.

Microsoft's process reports distinguish settings, source locations, item status and errors. They also explain why search estimates may differ from collected or exported totals. Save the reports and investigate material discrepancies rather than forcing every stage to have the same count. [4]

Measure a defined population

A count is useful only with its unit and scope: files, messages, attachments, containers or produced records.

03 / SEARCH AND LEGAL REVIEW

Test the search against the evidence

Turn an issue into a search hypothesis, then test it. A contract number, nickname, project code and email alias may all describe the same subject. Decide which fields and date meanings matter before relying on a query.

Document query versions and the population against which each ran. Record whether a date filter uses sent, received, modified or another field, and state the time-zone treatment. A later search should be explainable even if the software interface has changed.

Use known records to expose practical gaps

Start with several independently identified relevant items. If a search misses one, investigate the cause: the source may be absent, the wrong field may be selected, text may not have been extracted, or the wording may differ. Correct the cause or report the limitation.

Inspect representative hits and, where appropriate, material outside the hit set. High hit counts can reflect broad or ambiguous terms. Low counts can reflect gaps. Neither is a measure of legal completeness. OCR-generated text should be checked against the underlying image when wording matters.

Platform syntax also needs testing. Microsoft review-set searches support specific conditions and Boolean operators, and its documentation identifies limits on wildcard use. A query copied from another product may not mean the same thing. Retain the actual executed query, not just a description of its purpose. [5]

Keep legal decisions with the review team

Search results, similarity groups and automated labels can organize work. They do not independently resolve privilege or authorize disclosure. Counsel should define review categories, escalation routes and who can approve exclusions, redactions or a scope change.

A defensible negative result is bounded

Say which sources and period were searched, how they were processed and what the query could not test.

04 / PRODUCTION DESIGN

Agree the output before the final export

Ask the receiving team how it will use the material. A flat PDF bundle may be readable but unsuitable for examining spreadsheet formulas, sorting records or linking attachments to messages. Agree the necessary native, rendered, text and metadata components early. [3]

Make the specification concrete

Identifiers and context	Define document IDs, family links, custodian fields and treatment of prior productions. Keep a stable relationship between a produced item and its source reference.
Receiving format	Confirm native-file requirements, images or PDFs, searchable text, metadata fields and any load file used by the receiving platform. Test a representative sample before preparing the whole set.
Approval and release	Identify who approves the final population, privilege treatment and redactions. A completed technical export is not authorization to send it to another party.

Inspect what is actually in the package

Review the exported files, accompanying text, attachments and any native versions. Do not infer that a redaction visible in the review tool is safe in every exported representation.

For example, Microsoft currently documents that a redacted conversation export can include both the native conversation and the redacted PDF. Family or conversation expansion can also add related items beyond the filtered selection. This is a product-specific reason to inspect the actual payload and settings, not just the on-screen selection. [6]

Capabilities and defaults change. Confirm the current product behaviour and the agreed production specification for the particular matter.

05 / A USEFUL HANDOFF

Deliver a record the next team can use

A clear handoff explains how the authorized review population became the delivered set. Include the manifest, identifiers, relevant processing and export exceptions, and instructions needed to open or load the files. Record what was delivered and to whom.

A focused example

ILLUSTRATIVE SCENARIO / NOT A DFI CASE

A legal team needs communications about a disputed variation on a construction project. It receives a PST export, a shared-folder ZIP and several scanned site records.

A pilot review reveals that the project number is missing from the scanned text, the same drawing exists in two versions, and a responsive email links to a cloud file that is not in the export.

The next useful work is targeted: assess OCR quality, preserve the distinction between drawing versions, and resolve the linked-file gap. A larger keyword hit count would not fix those problems.

Close the loop after delivery

Have the recipient test the agreed format and reconcile a sample against the manifest. A successful download does not establish that attachment links, dates, text or images loaded correctly. Record corrections as new identified deliveries rather than silently replacing an unexplained folder.

For rolling productions, keep a delivery history that distinguishes additions, replacements and withdrawn items. Confirm how later review material relates to earlier production identifiers so the receiving team can understand what changed.

Agree ongoing storage, access and retention responsibilities. Any return or deletion should follow counsel's instructions, applicable obligations and the engagement terms. Do not assume the end of a review session ends preservation duties. [7]

Keep the next decision in view

Further processing is worthwhile when it resolves a material review gap or makes the approved evidence usable.

06 / EXPERT HELP AND REFERENCES

Plan the review with DFI

DFI supports the technical work of collecting, processing, searching and organizing digital material under agreed instructions. The service is designed to help counsel understand the available population and prepare an intelligible production, while legal review and disclosure decisions remain with the legal team. [1]

For an initial discussion, identify the sources, approximate volume, deadlines, prior work and receiving format. Explain any known gaps or unusual file types so the first stage can address the work that matters.

Arrange an initial evidence discussion

dfiforensics.ca/contact · 778-742-5621 · info@dfiforensics.ca

Contact DFI first to arrange secure evidence transfer.

An inquiry does not establish an engagement or guarantee a response time. Do not include passwords or confidential evidence with the initial inquiry.

Sources and technical notes

Primary sources checked 9 November 2026. This is general technical guidance, not legal advice. Verify applicable law, current product capabilities and the actual source environment for the matter.

[1] DFI Forensics · eDiscovery and evidence production
Current service scope, responsibilities and limitations.

[2] EDRM · Current Electronic Discovery Reference Model
Iterative activities, review and disposition.

[3] EDRM · Production Guide
Technical production forms and early specification; not adopted here as Canadian law.

[4] Microsoft · Process reports in eDiscovery
Source coverage, settings, errors and count reconciliation.

[5] Microsoft · Search content in a review set
Query conditions, field selection and syntax limitations.

[6] Microsoft · Export items from a review set
Family expansion, output options and redacted conversation handling.

[7] DFI Forensics · Evidence handling and quality controls
Authority, traceability, transfer and retention arrangements.

[8] DFI Forensics · Contact
Contact and secure-transfer arrangements.