

OPTIONAL

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT _____

[PLAINTIFF],

Plaintiff,

v.

[DEFENDANT],

Defendant.

CASE NO. [CASE #]

**DISCLOSURE OF
ELECTRONICALLY STORED
INFORMATION**

Pursuant to the parties' Stipulated Agreement Regarding Discovery of Electronically Stored Information ("ESI") entered on _____, [INSERT PARTY NAME] by and through its undersigned attorneys, make the following ESI Disclosures.

I. INTRODUCTORY STATEMENT

[INSERT PARTY NAME] has made a reasonable, good faith effort to name custodians and identify the sources of data likely to contain electronically stored information ("ESI"). [INSERT PARTY NAME] does not represent that it is identifying every custodian or source of ESI possibly relevant to this lawsuit. These ESI Disclosures are based on information available to date.

II. CUSTODIANS

Pursuant to Section B.1 of the ESI order, [INSERT PARTY NAME] identifies the following custodians most likely to have discoverable ESI in their possession, custody, or control related to this action.

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No.	Name	Title	Connection to Litigation & Information Type
1.			

[INSERT PARTY NAME] will produce responsive materials from these custodians, as they are maintained in the normal course of business.

No.	Name	Title	Connection to Litigation & Information Type
1.			

III. NON-CUSTODIAL DATA SOURCES

Pursuant to Section B.2 of the ESI order, [INSERT PARTY NAME] identifies the following non-custodial data sources most likely to contain discoverable ESI:

1.

[INSERT PARTY NAME] will produce responsive materials from these sources, as they are maintained in the normal course of business.

1.

IV. THIRD-PARTY DATA SOURCES

Pursuant to Section B.3 of the ESI order, [INSERT PARTY NAME] believes the following third-party application systems may have discoverable ESI, however it is not currently aware of any third-party data sources (e.g. third-party email providers, mobile device providers, cloud storage) that are likely to contain discoverable ESI.

1.

[INSERT PARTY NAME] will produce responsive materials from these sources, as they are maintained in the normal course of business.

1.

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V. INACCESSIBLE DATA

Pursuant to Section B.4 of the ESI order, [INSERT PARTY NAME] believes the following data sources/systems may have discoverable ESI but are not reasonably accessible under Federal Rule of Civil Procedure 26(b)(2)(B).

1.

FIRM NAME

By: _____

[ATTORNEY NAME], WSBA No. _____

[ATTORNEY NAME], WSBA No. _____

ADDRESS

ADDRESS

CITY, STATE ZIP

Telephone: _____

Email address

Email address

Attorneys for [INSERT PARTY NAME]