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15 UNITED STATES DISTRICT COURT
16 CENTRAL DISTRICT OF CALIFORNIA
17 WESTERN DIVISION

18 LEON D. MILBECK, on behalf of himself) CASE NO.: 2:18-CV-02612-SVW-
19 and all other similarly situated,) AGR
20 Plaintiff,) **DECLARATION OF**
21 v.) **SAMANTHA S. ANDERSON IN**
22 TRUECAR, INC. et al.,) **SUPPORT OF DEFENDANTS'**
23 Defendants.) **OPPOSITION TO PLAINTIFF'S**
24) **MOTION TO COMPEL**
25) Honorable Stephen V. Wilson
26)
27)
28)

1 I, Samantha S. Anderson, declare:

2 1. I am a Senior Project Manager – Portfolio Lead at Consilio, an
3 eDiscovery and managed review provider. I have been employed with Consilio for
4 almost four years and have a total of eighteen years of experience in the eDiscovery
5 industry. Consilio has been engaged by Wilson Sonsini Goodrich and Rosati to
6 collect, process, host, review, and produce discovery in the captioned matter. In my
7 role, I oversee projects and workflows. I am the day to day contact and lead for
8 Consilio in the captioned matter. My responsibilities include shepherding data
9 through the project life-cycle, communicating complex technical concepts both
10 within the organization and to external clients, developing workflows, and attending
11 to activities delegated by the client. I have personal knowledge of the facts set forth
12 herein and, if called as a witness, could testify thereto.

13 **Slack Data**

14 2. Slack is a messaging application that allows users to send direct
15 messages between two individuals, create channels for group conversations, and
16 send direct messages within a channel.

17 3. All data is exported from Slack (“Slack Data”) at the time of collection
18 and Consilio receives a zip file. There is no way to isolate any specific information,
19 such as particular channels or users and limit the collection to only that data.

20 4. All Slack Data must be processed before any information can be
21 extracted. This includes the number of channels, channel names, the number of
22 messages in a channel, or the total number of messages within the export. Search
23 terms are not able to be applied until after the full export has been converted.

24 5. Consilio received 1.67 gigabytes of compressed Slack Data in this
25 matter.

26 6. It is not possible to determine how much the volume will increase in
27 the conversion process without first processing all the Slack Data. In an unrelated
28

1 and confidential matter, the conversion of 100 megabytes of Slack Data resulted in
2 1.7 million messages. Applying these same metrics to the Slack Data in this matter,
3 I estimate that processing this Slack Data could potentially generate 17 million
4 messages.

5 7. It not possible to know for certain how long it will take to process
6 Slack Data before initiating the conversion process. In an unrelated and
7 confidential matter, the initial conversion of 100 megabytes of Slack Data took
8 approximately one and a half weeks. Given that the Slack Data in this matter is
9 more voluminous, I estimate it will take three to four weeks for the initial
10 conversion process.

11 8. Slack Data frequently requires additional processing time to address
12 conversion anomalies. It is not possible to determine how long it will take to
13 address conversion anomalies until the initial conversion process is complete. In an
14 unrelated and confidential matter, addressing conversion anomalies for 100
15 megabytes of Slack Data took approximately two weeks. Given that the Slack Data
16 in this matter is more voluminous, it could potentially take longer to address
17 conversion anomalies.

18 9. Once the Slack Data has been processed, there is a risk that running
19 search terms can sometimes uncover undetected conversion anomalies that need
20 further processing time to be addressed.

21 10. Slack Data appears as extracted text once converted. There is no native
22 file.

23 11. Unlike in an email or document review, the reviewer must scroll
24 through the extracted text to identify the start and end of relevant conversations.

25 12. A message that hits on a search term could be part of a group
26 conversation in a channel. A member of a channel can also send a direct message to
27 an individual or to a subset of a channel. These are called direct messages.
28

1 13. Slack Data has unique metadata fields and its production is often
2 separate from the rest of the ESI production. The quality control process and
3 preparation of the production is unique to the Slack Data being produced.

4 **Text Messages**

5 14. The collection process for mobile device data requires an image to be
6 taken of a user's mobile device. That image is then processed through forensic
7 tools. These processes can encounter technical difficulties which require time to
8 address.

9 15. Once processed, text messages are uploaded into a reviewable format
10 for attorney review.

11 16. Text messages cannot be reviewed in the same manner as email or
12 electronically saved documents.

13 I declare under penalty of perjury under the laws of United States of America,
14 that to the best of my knowledge, the foregoing is true and correct.

15 Executed this 26th day of April 2019 in Austin, Texas.

16
17 By: ~~/s/ Samantha S. Anderson~~
 Samantha S. Anderson

