

EXHIBIT B

DRAFT PLAN FOR REVIEW OF ELECTRONICALLY STORED INFORMATION*Garcia-Ramirez v. ICE*, No. 18-508 (D.D.C. filed Mar. 5, 2018)

December 4, 2018

SCOPE OF REVIEW: ICE collected 2.8 million documents (not pages) from 18 custodians.

PROPOSED SCHEDULE:

December 3, 2018	ICE ran a set of 26 agreed-upon search terms against the 2.8 million documents, resulting in: <ul style="list-style-type: none"> - Over 151,000 documents with hits - Over 408,000 documents in a family of documents with hits (for example, if an attachment to an email has a hit, the email and any other attachments are part of the family of documents).
December 5, 2018	ICE begin relevancy review in Relativity using Active Learning.
December 10, 2018	ICE begin privilege review of relevant documents. ICE has found that initial training of reviewers is crucial for an accurate production and much of the first week is consumed by training and responding to questions. ICE estimates that it is able to dedicate approximately 10 attorneys to the review process for 4 hours per day, 5 days a week, for first-line review. ICE is able to dedicate approximately 5 attorneys for second-line review. In addition, once documents are reviewed and ready for production, ICE has found that production of large volume of documents takes an average of 2 days.
December 14, 2018	ICE complete relevancy review.
December 21, 2018	Rolling production begins. ICE to make good faith efforts to produce 5,000 documents. Due to holidays, ICE anticipates a limited number of reviewers will be available from December 24 – January 11, 2018 and therefore cannot commit to document production during these weeks.
January 18, 2019	Rolling production continues. ICE to make good faith efforts to produce an additional 5,000 documents. Rolling production will continue every week with ICE making its best efforts to produce 5,000 documents every week until all relevant documents are produced.

BASIS OF CALCULATIONS:

Based on prior document reviews, ICE has found that, on average, a reviewer can review and redact approximately 25 documents per hour for privilege, including describing the privilege for a privilege log. ICE has also found that second-line review is critical during production. Second-line reviewers are anticipated to review approximately 50 documents per hour.