

# EXHIBIT B



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## ***A Proposal for the Antelope Valley Document Discovery Protocol***

In response to your request, we submit the following "Document Discovery Protocol." Glotrans' system provides facilities and procedures for the parties in the Antelope Valley case to manage a high volume of Document Productions<sup>1</sup>. Glotrans' system makes electronic copies of all Document Productions and data available to authorized case parties over the worldwide web, while maintaining security and confidentiality against exposure of data to unauthorized viewers.

### **Procedures:**

1. Document Requests<sup>2</sup> that are written requests for discovery shall be posted to the e-filing system of the Superior Court of California, County of Santa Clara by the propounding party. These Document Requests are not "filed" with the Court, but rather are e-served to all parties. When a Document Request is submitted to the system, it will have a unique document number that is provided by the e-filing system. This unique document number is used to track the Document Responses<sup>3</sup> and Document Productions that respond to the applicable Document Requests.
2. The party or parties to whom the Discovery Request is propounded, will Assemble<sup>4</sup> the Document Production. The producing party will then provide the Document Production to a Discovery Document Processor<sup>5</sup>. The producing party must provide the Discovery Document Processor with the unique document number of the Document Request.

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<sup>1</sup> "Document Production(s)" means: non-pleading, discovery documents, including, but limited to: (1) documents produced in response to requests or demands for production of documents.

<sup>2</sup> "Document Request(s)" means: non-pleading, discovery documents, including, but limited to: (1) all written requests or demands for production of documents.

<sup>3</sup> "Document Response(s)" means: non-pleading, discovery documents, including, but limited to: (1) all written responses to discovery requests; (2) all privilege logs; and (3) all trial exhibits.

<sup>4</sup> "Assemble" means: produce the Discovery Production in a manner that clearly shows separation of each document, i.e., (1) if paper documents are produced, a colored piece of paper between each document, or some similar system of organization, must be provided; or (2) if electronic files are produced, such as Adobe PDF files, each document must be contained in a separate Adobe PDF file.

<sup>5</sup> "Discovery Document Processor" means: a company such as Glotrans, that will Bates Stamp and index the Document Production; or, alternatively, some parties and/or their counsel may have in-house capabilities to Bates Stamp and index the Document Productions.



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3. Once the producing party's Document Production has been delivered to the Discovery Document Processor, the producing party submits a "Notice of Compliance to Request for Production of Documents" to the e-filing system, providing the unique document number of the Discovery Request and the date of the delivery of the Document Productions to the Discovery Document Processor. Alternatively, if a party and/or its counsel uses in-house discovery document processing, the responding party will submit a "Notice of Compliance to Request for Production of Documents" to the e-filing system after electronically transmitting the Bates stamped and indexed document images to the data center at Glotrans per paragraph 4, *infra*.
4. The Discovery Document Processor scans and indexes the Document Production, applying a "Bates Stamp" to each page image. The Discovery Document Processor then electronically transmits the Bates stamped and indexed document images to the data center at Glotrans, where the Document Productions are made available for viewing on the Antelope Valley Groundwater Litigation Discovery Document Web Portal. **Note:** *if a party uses a Discovery Document Processor other than Glotrans, the Discovery Document Processor will transfer files and indexing information to Glotrans according to the following specifications: each document will be transmitted as an Adobe PDF file.*
5. The Discovery Document Web Portal is accessible from a link on the Antelope Valley Groundwater case home page at [www.scefiling.org](http://www.scefiling.org). A party must be logged in to see the link or to access the discovery pages.
6. All logged-in parties may view the Discovery Requests, Discovery Responses and Document Productions (except those designated as "confidential" per paragraph 7, *infra*) as well as the "Notice of Compliance" documents.
7. The producing party may designate some of its Document Production as "confidential." Those Document Production images that are designated as "confidential" will only be visible to parties who have submitted the stipulation to the Court's confidentiality orders. The web system keeps track of which parties have stipulated and which have not. Only those parties who have submitted the confidentiality stipulation may view the "confidential" Document Production images.
8. The Document Productions are indexed by responding party, by the Document Request, and by other index criteria which may be selected by the parties when setting up the system. Authorized parties will be able to view Adobe PDF files of all submitted Document Productions.
9. The web system will send an e-service notice to all authorized parties when Document Productions are available for viewing on the system.



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**Cost Estimate:**

Discovery Document Processing

Scanning: 15 cents to 25 cents per page for 8.5"x11" black & white, depending on quality of paper; charges are higher for oversize paper that needs to be hand fed, processed through special scanner, or color-scanned.

Bates Stamping: 1 cent per line per page.

Indexing: around \$1 to \$1.50 per document depending on the number of index fields.

Discovery Document Web Portal

Upload and storage of documents, software modifications for discovery portal, customer service: 30 cents per page.

The above numbers assume a minimum volume of 250,000 pages.