



Second Requests and Antitrust Matters

Hart-Scott-Rodino (HSR) Second Requests and antitrust eDiscovery projects are synonymous with complexity, aggressive deadlines and enormous data volumes. With our years of experience successfully facilitating all aspects of electronic discovery in high pressure regulatory landscapes, including Second Requests, KLDisccovery is uniquely equipped to help manage your submissions to the FTC, DOJ and other global competition bureaus.

Experience that matters.

- Experience, efficiency, and communication are paramount when complying with a regulatory request. Our team is acutely aware of those dynamics and works closely with you to effectively negotiate scope and maintain transparency with regulators.
- KLD has experience with all technologies including technology assisted review (TAR), de-duplication and search methodologies to comply with these government agencies.
- We have produced data to more than 30 different bureaus around the world, including the U.S. authorities, U.K. authorities, Canadian Competition Bureau, French Competition Authority, German Competition Authority, European Commission, and European Free Trade Association, amongst others.
- KLDisccovery has experience with Second Requests in every major industry/vertical giving us deep familiarity with a broad variety of business practices, technical systems, file types, and database systems. This experience gives our clients a significant advantage in assessing and negotiating the most advantageous production requirements possible.

We offer the industry's most powerful data processing and review platforms, a dedicated team of Second Request experts and global managed review resources to help ensure timely and accurate productions to antitrust regulators.

Global footprint and scale.

- Dedicated project management and review teams working **24x7x365** with a hands-on approach that delivers timely results providing responding parties with a competitive advantage.
- Local operation in Washington, D.C. streamlines productions to the DOJ and FTC, affording our clients the distinct advantage with regulators as our white glove service can hand deliver rolling productions to the FTC or DOJ.
- Our global footprint, including our team of forensic collection specialists staffed throughout Europe and Asia, lends itself well to cross-border matters and requests spanning international regulators.
- State-of-the-art data centers; ISO 27001 certified and SOC2 compliant.

Case Studies



Predictive Coding in a Second Request

The Situation

The U.S. Federal Trade Commission (FTC) issued a Second Request to a company undergoing a merger.

The Solution

A fast-tracked review utilized a KLDDiscovery review platform and Predictive Coding technology. KLDDiscovery data collection experts collected over **2.5 terabytes** of data from more than **60 custodians**, which was reduced to **880 gigabytes** for review using KLDDiscovery technologies. A team of four KLDDiscovery document reviewers used Predictive Coding to speed up the review and identify critical documents, with the final production reduced to less than **500,000 documents**.

The Resolution

KLDDiscovery's Predictive Coding returned a 90 percent document classification accuracy rate, which aided the merging companies in completing the FTC production in **less than two months**.



Global Antitrust Matter

The Situation

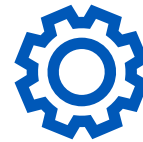
A global company based in the U.S. needed to produce documents to the U.S. Department of Justice (DOJ) in an antitrust matter.

The Solution

Data collection experts from KLDDiscovery collected documents in Japan and Korea, hosting the data in our Japan data center. Ediscovery technologists utilized early data assessment, searching and Predictive Coding technologies from KLDDiscovery. Document Reviewers rapidly worked on the remaining Japanese and English documents.

The Resolution

KLDDiscovery eliminated 1,200 hours in document review, resulting in almost **\$1.2 million in savings** and a successful production to the DOJ.



Proven Workflow Helps Close the Deal

The Situation

Approval of a multibillion-dollar acquisition in the energy industry hinged on a quick compliance with the FTC's second request.

The Solution

Our dedicated Second Request specialists worked closely with counsel to employ KLDDiscovery's proven workflows, Predictive Coding, and screening for privilege, PII, and PHI to meet the needs of the project. KLDDiscovery helped our client produce **2.5 million** documents out of **11 terabytes** of data collected from **52 custodians** and did all the work within **45 days**, from beginning to end.

The Resolution

Our client's transaction was approved within **30 days** of final production.