

Cross-Border Regulatory Investigation

Challenge

As part of a wide-ranging U.S. regulatory investigation, a multinational finance and insurance corporation with global operations faced a large discovery project that uncovered more than 35 million potentially relevant documents in the United States and France.

Highlights

Using a **custom-built hashtag process**, the client was able to reduce the massive data set by 99.8% enabling them to **easily comply** with a large-scale regulatory investigation without violating regulations.

“After partnering with Legility, the client reduced their total body of French documents for production from **1 million to 2,000 - an incredible 99.8% reduction.**”

Solution

The U.S. courts requested production of all potentially relevant documents from the corporation's Paris operation. Although the company suspected that many of the French documents were duplicative of the U.S. documents, compliance was mandatory, and the client needed to be able to prove the documents were duplicative without violating any French or international regulations.

Due to the French Blocking Statute (French Law 68-678 of 26 July 1968), which broadly prohibits the transfer of data to be used as legal evidence in proceedings outside of France, the client was legally unable to produce data stored in France to U.S. legal teams to verify whether the data was duplicative.



Solution

Legility then created a custom-built hashtag process to generate hashes for the French documents, which could then be exported to the U.S. for comparison with the documents under review there. This allowed the client to deduplicate the data set without violating any cross-border data transfer regulations.

After running our customized hashtag deduplication, the body of documents had been reduced from about 1 million French documents to fewer than 20,000 documents. Although significant, it was still an amount of data unlikely to be approved for export by the CNIL (National Commission on Informatics and Liberty | *commission nationale de l'informatique et des libertes*), the national data protection authority for France.

So we architected a second step to further reduce the data. We first deployed a mobile service solution application in the company's Paris office - installing a mobile server rack, setting up a local Relativity instance, and creating a completely on-site, off-the-internet, secure war room to service the project.

We sourced and hired an on-site review team of experienced reviewers fluent in both French and English with subject matter expertise relevant to the client.

Over the course of two weeks, the team reviewed 20,000 remaining documents for relevance, privilege, and personally identifiable information (PII), and reduced the data set further, to fewer than 2,000 documents.

Results

After partnering with Legility, the client reduced their total body of French documents for production from 1 million to 2,000 – an incredible reduction of 99.8%, and enabling them to easily comply with a large-scale regulatory investigation without violating French regulations.

By the Numbers

35 MILLION

documents for production

2

countries with two different languages

20k

documents after custom hash process

20k

documents after bilingual, on-site review

99.8%

total document population reduction



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