

TEMPLATE 7 · TAR / DISCOVERY

Document Review & E-Discovery TAR Disclosure

CASE CAPTION

Court	Case no.
Plaintiff(s)	Defendant(s)
Judge	Magistrate / related
Filing certified (title)	Dkt.

FILER

Attorney name	Bar no.	State
Firm	Role (e.g., lead, co-counsel)	
Client (or redacted id.)	Date of certification	

REVIEW METHODOLOGY

- TAR L1 (Predictive Coding).** Supervised classifier trained on a seed set; results validated by control-set sampling and elusion testing.
- TAR L2 (Continuous Active Learning).** Iterative classifier with human-in-the-loop training; halt point determined by recall, stability, or richness metrics.
- Generative AI classification or summarization.** LLM-based categorization, issue tagging, or summarization, with attorney spot-check or stratified sampling validation.
- Linear / manual review only.** No TAR or generative AI used in this matter.

PLATFORM & MODEL IDENTIFICATION

Review platform	Version
Underlying classifier or model	Hosted by
Vendor name	ESI vendor contact

VALIDATION PROTOCOL

Recall target / achieved

Target

Achieved

Confidence interval

Precision target / achieved

Target

Achieved

Confidence interval

Elusion / control-set methodology

AGREED PROTOCOL LANGUAGE

The producing party will conduct review using the methodology identified above. The producing party will: (i) disclose the name of the review platform and the general type of classifier or model used (without disclosing proprietary parameters or training data composition); (ii) report final recall and precision metrics with stated confidence intervals; (iii) preserve, for the duration of the matter, the seed set, control set, and validation logs necessary to demonstrate reasonableness under Sedona Conference Best Practices Commentary on Search and Information Retrieval (2023 ed.); and (iv) meet and confer in good faith regarding any methodological dispute prior to motion practice.

Use of any generative AI tool for issue tagging, summarization, or relevance prediction will be disclosed by tool name and version. The producing party will not enter privileged or work-product material into any AI tool that does not provide contractual zero data retention and non-training commitments. Any such material inadvertently entered will be subject to the Federal Rule of Evidence 502(d) order entered in this matter.

Privilege risk

Generative AI tools without enforceable zero-retention and non-training commitments may create privilege and confidentiality exposure. Confirm vendor terms BEFORE inputting any potentially privileged or confidential material. Where possible, prefer on-premises or zero-retention API deployments for matter-specific use.

CERTIFICATION & SIGNATURE

Counsel certifies that the methodology and metrics disclosed above are accurate to the best of counsel's information following reasonable inquiry of the ESI vendor and review team, and that the validation protocol is reasonable and proportional to the needs of the case under Federal Rule of Civil Procedure 26(b)(1).

Signature

Printed name

Bar no.

Firm

Date

Email

Phone

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