

**IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA
CIVIL DIVISION**

STATE OF FLORIDA
OFFICE OF FINANCIAL REGULATION,

Plaintiff,

v.

CASE NO.: 50-2021-CA-008718-XXXX-MB

NATIONAL SENIOR INSURANCE, INC.
D/B/A SEEMAN HOLTZ,
MARSHAL SEEMAN,
CENTURION INSURANCE SERVICES GROUP, LLC,
BRIAN J. SCHWARTZ,
EMERALD ASSETS 2018, LLC,
INTEGRITY ASSETS 2016, LLC,
INTERGRITY ASSETS, LLC,
PARA LONGEVITY 2014-5, LLC,
PARA LONGEVITY 2015-3, LLC,
PARA LONGEVITY 2015-5, LLC,
PARA LONGEVITY 2016-3, LLC,
PARA LONGEVITY 2016-5, LLC,
PARA LONGEVITY 2018-3, LLC,
PARA LONGEVITY 2018-5, LLC,
PARA LONGEVITY 2019-3, LLC,
PARA LONGEVITY 2019-5, LLC,
PARA LONGEVITY 2019-6, LLC,
PARA LONGEVITY VI, LLC,
SH GLOBAL, LLC N/K/A PARA LONGEVITY V, LLC,
ALTRAI GLOBAL, LLC A/K/A ALTRAI HOLDINGS, LLC,
VALENTINO GLOBAL HOLDINGS, LLC,
AMERITONIAN ENTERPRISES, LLC,
SEEMAN-HOLTZ CONSULTING CORP.,
CENTURION ISG Holdings, LLC,
CENTURION ISG Holdings II, LLC,
CENTURION ISG (Europe) Limited,
CENTURION ISG SERVICES, LLC,
CENTURION ISG FINANCE GROUP, LLC,
CENTURION FUNDING SPV I LLC,
CENTURION FUNDING SPV II LLC,
GRACE HOLDINGS FINANCIAL, LLC,
PRIME SHORT TERM CREDIT INC.,

Defendants.

THE ESTATE OF ERIC CHARLES HOLTZ,
SEEMAN HOLTZ PROPERTY AND CASUALTY, LLC
F/K/A SEEMAN HOLTZ PROPERTY AND CASUALTY, INC.,
SHPC HOLDINGS I, LLC,

Relief Defendants.

/

CORPORATE MONITOR'S RESPONSE TO LETTER/REQUEST BY STEVEN A. ROTH FOR COPIES OF WELLS FARGO BANK, N.A. PRODUCTION

Daniel J. Stermer, as Court-appointed Corporate Monitor (the "Corporate Monitor") for the property, assets and businesses of the thirty-two (32) corporate entities¹ (the "Consenting Corporate Defendants") pursuant to the *Agreed Order Granting Plaintiff's Consent Motion for Appointment of Corporate Monitor and Related Injunctive Relief*, dated September 14, 2021, and the *Agreed Order Granting Corporate Monitor, Daniel J. Stermer's Unopposed Motion to Expand Corporate Monitorship Estate*, dated January 6, 2022, and pursuant to Florida Rules of Civil Procedure, hereby responds (the "Response") to the letter/request dated March 1, 2023 (the "Roth Request"), submitted to the Court by Steven A. Roth ("Roth") requesting copies of documents produced by Wells Fargo Bank, N.A. ("Wells Fargo") to the Corporate Monitor in response to the *Second Supplemental Subpoena Duces Tecum Without Deposition* (the "Second Supplemental Subpoena") issued to Wells Fargo on June 2, 2023. In support of this Response, the Corporate

¹ The Consenting Corporate Defendants include: NATIONAL SENIOR INSURANCE, INC. D/B/A SEEMAN HOLTZ, CENTURION INSURANCE SERVICES GROUP, LLC, EMERALD ASSETS 2018, LLC, INTEGRITY ASSETS 2016, LLC, INTERGRITY ASSETS, LLC, PARA LONGEVITY 2014-5, LLC, PARA LONGEVITY 2015-3, LLC, PARA LONGEVITY 2015-5, LLC, PARA LONGEVITY 2016-3, LLC, PARA LONGEVITY 2016-5, LLC, PARA LONGEVITY 2018-3, LLC, PARA LONGEVITY 2018-5, LLC, PARA LONGEVITY 2019-3, LLC, PARA LONGEVITY 2019-5, LLC, PARA LONGEVITY 2019-6, LLC, PARA LONGEVITY VI, LLC, SH GLOBAL, LLC N/K/A PARA LONGEVITY V, LLC, VALENTINO GLOBAL HOLDINGS, LLC, AMERITONIAN ENTERPRISES, LLC, SEEMAN-HOLTZ CONSULTING CORP., CENTURION ISG HOLDINGS, LLC, CENTURION ISG HOLDINGS II, LLC, CENTURION ISG (EUROPE) LIMITED, CENTURION ISG SERVICES, LLC, CENTURION ISG FINANCE GROUP, LLC, CENTURION FUNDING SPV I LLC, CENTURION FUNDING SPV II LLC, PARA GLOBAL 2019, LLC, ALLOY ASSETS, LLC, SEEMAN HOLTZ WEALTH MANAGEMENT, INC. AGENCY ACQUISITION FUNDING, LLC, and AMERICA'S FAVORITE INSURANCE SERVICES LLC

Monitor states:

1. On September 10, 2021, the Plaintiff, State of Florida, Office of Financial Regulation filed a *Consent Motion for Appointment of Corporate Monitor*, seeking the appointment of the Corporate Monitor for the property, assets, and business of twenty-seven of the Consenting Corporate Defendants, as well as a temporary injunction against those twenty-seven Consenting Corporate Defendants and two natural-person Defendants, Marshal Seeman and Brian J. Schwartz.

2. On September 14, 2021, the Court entered an *Agreed Order Granting Plaintiff's Consent Motion for Appointment of Corporate Monitor and Related Injunctive Relief* (the "September 14, 2021 Order"), thereby approving and appointing, *inter alia*, Daniel J. Stermer as the Corporate Monitor for the twenty-seven Consenting Corporate Defendants and their affiliates, subsidiaries, successors and assignees, until further Order of the Court.

3. On January 6, 2022, the Court entered an *Agreed Order Granting Corporate Monitor, Daniel J. Stermer's Unopposed Motion to Expand Corporate Monitorship Estate*, thereby expanding the scope of the corporate monitorship created in this case to include the following five additional entities:

- a. Para Global 2019, LLC, a Georgia limited liability company;
 - b. Alloy Assets, LLC, a Florida limited liability company;
 - c. Seeman Holtz Wealth Management, Inc., a Florida corporation;
 - d. Agency Acquisition Funding, LLC, a Delaware limited liability company;
- and
- e. America's Favorite Insurance Services LLC, a Delaware limited liability company.

4. Pursuant to the September 14, 2021 Order, the Corporate Monitor has issued approximately thirty-four subpoenas to various entities, individuals and financial institutions requesting various documents, including, but not limited to, bank statements and other financial records. Among the subpoenas issued are four subpoenas issued to Wells Fargo.

5. On or about March 1, 2023, Roth submitted² the Roth Request, requesting the Court to permit Roth to view the banking records produced by Wells Fargo to the Corporate Monitor pursuant to the *Second Supplemental Subpoena Duces Tecum Without Deposition* (the “Second Supplemental Subpoena”) issued to Wells Fargo on June 2, 2022. As set forth in the Roth Request, Roth states that he makes his request for copies of the documents produced by Wells Fargo in order to gather information that may assist him in determining the use of the funds that he lent. A copy of the Roth Request is attached as **Exhibit A**.

6. The Corporate Monitor files this Response and states that all documents produced by Wells Fargo in response to subpoenas issued to Wells Fargo by the Corporate Monitor in this case are governed by the *Stipulated Protective Order* (the “Protective Order”) entered by the Court on December 14, 2021. As set forth in the Protective Order, prior to making any disclosure, the Corporate Monitor (as recipient) is directed to provide Wells Fargo (as disclosing party) with prompt written notice of the requirement to produce documents subject of the Protective Order, so that Wells Fargo may seek a protective order or other remedy, and/or provide reasonable assistance in opposing such disclosure or seek a protective order or other limitations on disclosure.

7. This Response will be served on Wells Fargo and shall be deemed notice to Wells Fargo under the Protective Order. Wells Fargo may also file any response to the Roth Request.

² It appears from an automated electronic mail message received by the undersigned counsel from the Court on March 1, 2023 at 10:32 PM, that the Roth Request submitted by Roth was rejected by the Court because it was submitted in .pdf format and not Microsoft Word (docx).

8. While being sympathetic to the noteholders and creditors like Mr. Roth, the Corporate Monitor must comply with terms of the Protective Order and submits that absent showing a specific need for all of the Wells Fargo records that a blanket provision of same upon any such request would result in the estate and Wells Fargo being inundated with requests which would be unduly burdensome to the Corporate Monitor, his counsel, and the Monitorship Estate, to comply with such requests.

DATED: March 13, 2023

BERGER SINGERMAN LLP
Counsel for Corporate Monitor
525 Okeechobee Boulevard, Suite 1250
West Palm Beach, FL 33401
Tel. (561) 241-9500
Fax (561) 998-0028

By: /s/ *Brian G. Rich*

Brian G. Rich, FBN 38229
brich@bergersingerman.com
Gavin C. Gaukroger, FBN 76489
ggaukroger@bergersingerman.com
Michael J. Niles, FBN 107203
mniles@bergersingerman.com
DRT@bergersingerman.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 13, 2023, the foregoing was filed using the Florida Court's E-Filing Portal, which served a copy of the foregoing electronically upon all electronic service parties.

I FURTHER CERTIFY that a true and correct copy of the foregoing was served on March 13, 2023, by electronic transmission and first class, U.S. Mail upon all parties listed below.

By: /s/ *Brian G. Rich*

Brian G. Rich

Steven A. Roth
21878 Canadensis Circle
Boca Raton, FL 33428
stevenaroth@gmail.com

Carly S. Everhardt, Esq.
Jonathan B. Morton, Esq.
K&L Gates, LLP
Attorneys for Wells Fargo Bank, N.A.
Southeast Financial Center
200 S. Biscayne Boulevard, Suite 3900
Miami, FL 33131-2399
carly-everhardt@klgates.com
jonathan.morton@klgates.com

EXHIBIT A

Steven A. Roth
21878 Canadensis Circle
Boca Raton, FL 33428
Email: stevenaroth@gmail.com
Cellular: 561-702-8991

March 1, 2023

The Honorable Bradley Harper
Circuit Civil Court Judge of the Fifteenth Circuit
205 North Dixie Hwy., Room 9.1215
West Palm Beach, FL 33401

Re: Case No.: 50-2021-CA-008718-XXXX-MB

Dear Judge Harper,

I am a local insurance agent, and have served my community for 35 years. Due to a stage four kidney cancer diagnosis, in 2016 I sold my agency to Seeman Holtz Property and Casualty.

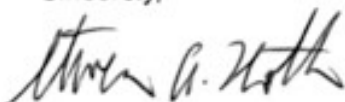
On June 12, 2018; I lent Seeman Holtz Insurance Services (SHIS) \$650,000. I wired the funds to SHIS' Wells Fargo Account Number [REDACTED] 6156.

I understand that these bank records were retrieved via the attached subpoena. I asked the Court Monitor, Daniel Stermer if I could have a copy of these bank records. However, Attorney, Brian Rich said that they could not share that information without the permission of the Court.

I am hereby requesting your permission to allow me to view these bank records which were received under this subpoena. My goal is to gather information that may assist me in determining the use of the funds that I lent. If the funds were used improperly, I may have some recourse in trying to recover and minimize my loss.

Thank you in advance for your consideration of this matter. I look forward to your response.

Sincerely,



Steven A. Roth

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CASE NO.: 50-2021-CA-008718-XXXX-MB

NATIONAL SENIOR INSURANCE, INC.
D/B/A SEEMAN HOLTZ,
MARSHAL SEEMAN,
CENTURION INSURANCE SERVICES
GROUP, LLC, BRIAN J. SCHWARTZ,
EMERALD ASSETS 2018, LLC,
INTEGRITY ASSETS 2016, LLC,
INTERGRITY ASSETS, LLC,
PARA LONGEVITY 2014-5, LLC,
PARA LONGEVITY 2015-3, LLC,
PARA LONGEVITY 2015-5, LLC,
PARA LONGEVITY 2016-3, LLC,
PARA LONGEVITY 2016-5, LLC,
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PARA LONGEVITY 2018-5, LLC,
PARA LONGEVITY 2019-3, LLC,
PARA LONGEVITY 2019-5, LLC,
PARA LONGEVITY 2019-6, LLC,
PARA LONGEVITY VI, LLC,
SH GLOBAL, LLC N/K/A PARA
LONGEVITY V, LLC, ALTRAI GLOBAL,
LLC A/K/A ALTRAI HOLDINGS, LLC,
VALENTINO GLOBAL HOLDINGS, LLC,
AMERITONIAN ENTERPRISES, LLC,
SEEMAN-HOLTZ CONSULTING CORP.,
CENTURION ISG Holdings, LLC,
CENTURION ISG Holdings II, LLC,
CENTURION ISG (Europe) Limited,
CENTURION ISG SERVICES, LLC,
CENTURION ISG FINANCE GROUP, LLC,
CENTURION FUNDING SPV I LLC,
CENTURION FUNDING SPV II LLC,
GRACE HOLDINGS FINANCIAL, LLC,
PRIME SHORT TERM CREDIT INC.,

Defendants.

THE ESTATE OF ERIC CHARLES HOLTZ,
SEEMAN HOLTZ PROPERTY AND CASUALTY, LLC
F/K/A SEEMAN HOLTZ PROPERTY AND CASUALTY, INC.,
SHPC HOLDINGS I, LLC,

Relief Defendants.

SECOND SUPPLEMENTAL SUBPOENA DUCES TECUM WITHOUT DEPOSITION

THE STATE OF FLORIDA:

TO:

Wells Fargo Bank, N.A.
Attn: Corporation Service
Company,
Registered Agent
1201 Hayes Street
Tallahassee, FL 32301-2525

Jonathan B. Morton, Esq.
K&L Gates
Southeast Financial Center, Suite 3900
200 South Biscayne Boulevard
Miami, FL 33131
Jonathan.morton@klgates.com

Timothy J. Lindquist, Paralegal
Wells Fargo Legal Department
90 South 7th Street, 17th Floor
Minneapolis, MN 55479
Timothy.j.lindquist@wellsfargo.com

Rachel M. Tausend, Esq.
K&L Gates
925 Fourth Avenue, Suite 2900
Seattle, WA 98104
Rachel.tausend@klgates.com

YOU ARE COMMANDED to appear at BERGER SINGERMANN LLP, 525 Okeechobee Boulevard, Suite 1250, West Palm Beach, FL 33401, on **June 13, 2022 at 9:30 a.m.**, and to bring with you at the time and place all documents listed on the attached **Schedule A**. These items will be inspected and may be copied at that time. You will not be required to surrender the original items.

THIS IS NOT A DEPOSITION. NO TESTIMONY WILL BE TAKEN.

You may comply with this subpoena by providing legible copies of the items to be produced to the attorney whose name appears on this Subpoena on or before the scheduled date of production. You may condition the preparation of the copies upon the payment in advance of the reasonable cost of preparation. You may mail or deliver the copies to the attorney whose

name appears on this subpoena and thereby eliminate your appearance at the time and place specified above. You have the right to object to the production pursuant to this subpoena at any time before production by giving written notice to the attorney whose name appears on this subpoena.

If you fail to:

- (1) Appear as specified; or
- (2) Furnish the records instead of appearing as provided above; or
- (3) Object to this subpoena, you may be in contempt of court.

YOU ARE SUBPOENAED to appear by the following attorney, and unless excused from this Subpoena by the attorney whose name appears on this Subpoena or the court, you shall respond to this subpoena as directed.

Dated June 2, 2022

BRIAN G. RICH, ESQ.
For the Court

By: s/ Brian G. Rich
Brian G. Rich
Florida Bar No. 38229

BERGER SINGERMANN LLP
Attorneys for Corporate Monitor, Daniel J. Stermer
525 Okeechobee Boulevard, Suite 1250
West Palm Beach, FL 33401
Tel.: (561) 241-9500
Fax: (561) 998-0028
E-mail: brich@bergersingerman.com

SCHEDULE A

DEFINITIONS

As used in this Subpoena, certain terms have specific meanings as defined in this section.

A. The term “all” shall mean “any and all” so as to bring within the scope of the requests herein all documents and things that otherwise might be construed to be outside its scope.

B. The terms “and” as well as “or” shall be construed both disjunctively and conjunctively, as necessary, to bring within the scope of the request all responses that might otherwise be construed to be outside its scope.

C. The terms “any” and “each” should be understood to include and encompass “all.”

D. The terms “document”, “documents” and “documentation” means any written or graphic matter or other means of preserving thought or expression including correspondence, memoranda, notes, messages, letters, emails, invoices, reports, receipts and statements of account, ledgers, books, drawings, graphs, charts, photographs, phone records, electronic tapes, discs or other recordings, computer programs, and other data compilations from which information can be obtained, including both written or electronic communications. “Documents” shall also include all electronically stored information (hereinafter “ESI”) including but not limited to all computer-generated information or data of any kind, stored in or on any storage media located on computers, file servers, mobile devices, smart phones, disks, back up tapes or other media.

E. The terms “communication” and “communications” means any oral, written or electronic statement or discussion.

F. The term “related to” shall mean having as its subject, concerning, referring to, describing, evidencing or, in whole or in part, constituting.

G. The terms “You” and “Your” shall mean the individual this subpoena is directed to including any agents, representatives, or any person or entity acting or purporting to act on behalf of, in concert with, or is subject to the direction or control of, said individual.

H. The term “Consenting Corporate Defendants” shall mean, collectively, the following:

1. NATIONAL SENIOR INSURANCE, INC. D/B/A SEEMAN HOLTZ,
2. CENTURION INSURANCE SERVICES GROUP, LLC,
3. EMERALD ASSETS 2018, LLC,
4. INTEGRITY ASSETS 2016, LLC,
5. INTEGRITY ASSETS, LLC,
6. PARA LONGEVITY 2014-5, LLC,
7. PARA LONGEVITY 2015-3, LLC,
8. PARA LONGEVITY 2015-5, LLC,
9. PARA LONGEVITY 2016-3, LLC,

10. PARA LONGEVITY 2016-5, LLC,
11. PARA LONGEVITY 2018-3, LLC,
12. PARA LONGEVITY 2018-5, LLC,
13. PARA LONGEVITY 2019-3, LLC,
14. PARA LONGEVITY 2019-5, LLC,
15. PARA LONGEVITY 2019-6, LLC,
16. PARA LONGEVITY VI, LLC,
17. SH GLOBAL, LLC N/K/A PARA LONGEVITY V, LLC,
18. VALENTINO GLOBAL HOLDINGS, LLC,
19. AMERITONIAN ENTERPRISES, LLC,
20. SEEMAN-HOLTZ CONSULTING CORP.,
21. CENTURION ISG Holdings, LLC,
22. CENTURION ISG Holdings II, LLC,
23. CENTURION ISG (Europe) Limited,
24. CENTURION ISG SERVICES, LLC,
25. CENTURION ISG FINANCE GROUP, LLC,
26. CENTURION FUNDING SPV I LLC, and
27. CENTURION FUNDING SPV II LLC

INSTRUCTIONS

A. This Subpoena is intended to cover all documents in your possession, custody or control, or that you have the legal right or practical ability to obtain, whether located at your home or at any of your offices, at the offices or homes of family members, agents, successors or assigns, accountants, attorneys, assistants, bankers, affiliates or others, or at any other place, including in any remote or online storage (including, for example, in a Web-based or other online document storage system, contact storage or management system, calendar system or email account).

B. This Subpoena is intended to cover all documents in whatever form including, without limitation, in electronic form on any computer (including any personal computer), PDA, mobile phone, email device, portable electronic storage device, or information storage media (including without limitation any Web-based or other online document storage system, contact storage or management system, calendar system or email account) in the possession, custody or control of you, your agents, any service subscribed to by you or on your behalf, or any other persons acting or purporting to act on your behalf.

C. This Subpoena is intended to cover all drafts of documents regardless of whether they were executed or not, as well as incomplete or partial documents, to the extent such draft or incomplete documents differ from other produced documents.

D. Documents shall be produced in their original file folders or, in lieu thereof, any writing on the file folders from which documents are taken shall be copied and appended to such documents, and the persons for whom, or department, division, or office for which, such file folders are maintained shall be identified.

E. Documents produced pursuant to this Subpoena shall be identified by the number of the request in response to which they are produced or produced as they are kept in the usual course of business.

F. Production of Electronically Stored Information (“ESI”) or any electronically stored data shall be in native format unless otherwise agreed, consistent with attached **Schedule B**. In producing documents consisting of electronically stored data in machine-readable form in response to any request, provide such data in a form that does not require specialized or proprietary hardware or software.

G. If a claim of privilege is asserted in objecting to any request in this Subpoena, or sub-part thereof, and a full response is not provided on the basis of such assertion, respond to any part of the request which is not objectionable, produce all nonprivileged portions of responsive documents in redacted form, and furnish the following information in a privilege log with respect to that portion of the request as to which the claim of privilege is asserted: (1) the nature of the privilege that is being claimed; (2) the type of document or thing withheld; (3) the general subject matter of the document; (4) the date of the document; (5) such other information as is sufficient to identify the document for a *subpoena duces tecum* including where applicable, the author(s) of the document, the addressee(s) of the documents, and the other recipients, and, where not apparent, the relationship of the author, addressee and other recipients to each other.

H. If you maintain that any document or record responsive to any request in this Subpoena has been destroyed or is no longer in your possession, custody or control, state whether it: (1) is missing or lost; (2) has been destroyed; (3) has been transferred, voluntarily or involuntarily, to others; or (4) has been disposed of in some other manner. In addition, where possible, set forth (i) the content of said documents, (ii) the location of any copies of said document, (iii) the date of such destruction, and (iv) the name of any person(s) who ordered, authorized or participated in such destruction.

I. If a document is no longer in your possession, but a copy of said document has been maintained by an agent or consultant to you (such as, but not limited to, your accountants, auditors, attorneys, assistants, bankers, affiliates, or any expert retained by you), identify such document and identify the present custodian of such document.

J. Each request calls for production of each document and thing in its entirety, without abbreviation, redaction, expurgation or modification.

K. These are continuing requests for the production of documents and things. If, after making your initial production, you or your attorneys, agents or representatives, obtain or become aware of any further documents or things responsive to this Subpoena, you are requested to promptly produce such additional documents or things.

DOCUMENTS TO BE PRODUCED

With respect to each of the following account numbers:

Account Number	
██████████	6156
██████████	7750
████████████████████	2903
██████████	8539
██████████	8633
██████████	3528
██████████	6271
██████████	0122
██████████	2052
██████████	8049
██████████	3937
██████████	3510

please produce

1. Bank statements for each month from January 1, 2015 to present.
2. All account records, including, but not limited to, signature cards, account applications, and account closure records.
3. Communications with any agents, managers, representatives, attorneys, or others regarding the accounts listed above.

SCHEDULE “B”
Production of Electronically Stored Information (ESI)
FORM OF PRODUCTION

A. Imaged Production: All electronically stored information (“ESI”) is to be produced in a structured format including industry standard load files, bates numbered image files, native files, and searchable text files.

1. Images

- a. ESI will be produced (printed and loaded) in 300DPI resolution or greater, Group IV Monochrome single-page Tagged Image File Format (.TIF) files.
- b. All Native files provided and word searchable OCR/extracted text (Optical Character Recognized – i.e. searchable text) in UTF-8 format.
- c. Color pages should be produced as color JPEG images.
- d. Email natives should be delivered in MSG or EML format.
- e. Metadata will be provided in a DAT file with standard Concordance delimiters.
- f. The text files containing the OCR/Extracted Text shall be produced in multi-page format with the name corresponding to its associated document.
- g. **All small and oversized images should be resized to fit on 8.5x11 canvas.**

2. Load File

- a. Load files will be provided in Opticon (.OPT) format and an IPRO LFP (.lfp) format.

3. Folder Structure: The files should be delivered with the following folder structure:

- a. **IMAGES** – contains the TIF and JPG files, up to 10,000 items.
- b. **DATA** – contains the OPT and LFP files and the metadata text file (DAT)
- c. **NATIVES** – contains all the original native files named as the BEGDOC
- d. **TEXT** – contains the document-level OCR/Extracted text files

named as the BEGDOC

B. Redacted Documents

1. By agreement, native documents will not be produced for Redacted Documents, which will be produced in 300DPI Group IV Monochrome Tagged Image File Format (.TIF or .tiff) files without native files or redacted information.
2. Metadata for redacted files shall be produced.
3. By agreement, metadata which discloses the content of redacted information may be withheld.
4. The specs for redacted documents are:
 - a. Single page TIF images.
 - b. MultiPage text files, also known as “Document level.”
 - c. Metadata text file with concordance delimiters.
 - d. Load files will be provided in Opticon (.OPT) format and an IPRO LFP (.lfp) format.

C. Metadata: The following metadata fields will be produced: (Metadata is defined as “unaltered metadata that exists at the time of collection”).

Eclipse Metadata Field	Field Description
BegDoc	BegDoc
EndDoc	EndDoc
BegAttach	BegAttach
EndAttach	EndAttach
Application	Application/Application Name
AttachmentIDs	Bates numbers of attachment(s)
Attachments	Names of attachment files
AttachRange	Attachment Range
Authors	Document author
BCC	BCC (Name + email)
CC	CC (Name + email)
Companies	Company name
Custodian	Custodian (Last, First)
DateCreated	Date created (MM/DD/YYYY)
DateReceived	Date email received (MM/DD/YYYY)
DateSaved	Date last saved (MM/DD/YYYY)
DateSent	Date email sent (MM/DD/YYYY)
Doctitle	Title

FileType	Document Type Description
FileExtension	File extension
Doclink	Link to native files produced
ExtractedText	Link to text files produced
Filename	Original filename
FileSize	File size in bytes
Folder	Relative Path (Inbox, Sent, etc.)
From	Sender (Name + email)
Hash_Code	MD5 hash
Header	Email header
InternetMSGID	IntMsgID
MessageID	MsgID
NumAttachments	Attachment count
NumPages	Page count
ParentID	Parent bates number
Password_Protect	Y/N field
Read	Y/N
SHA1	SHA1 hash
Sources	CD, DVD, hard drive; brief desc. of data
StoreID	Name of PST/NSF file (if relevant)
Subject	Email/Document subject
TimeReceived	Time email received (12-hour HH:MM)
TimeSent	Time email sent (12-hour HH:MM)
To	To (Name + email)

For **NATIVE .xls (Excel), .ppt (PowerPoint), and .doc (Word) files** the following additional metadata fields should be included.

Excel_Comments	Comments
Excel_HiddenColumns	Hidden Columns
Excel_HiddenRows	Hidden Rows
Excel_HiddenWorksheets	Hidden Worksheets
Num_Lines	Number of lines
Num_Paragraphs	Number of paragraphs
Num_slides	Number of slides
Num_Notes	Number of notes
Num_HiddenSlides	Number of hidden slides
Num_Multimedia	Number of multimedia clips
Security	Security
Word_Comments	Comments
Word_HiddenText	Hidden Text
Word_Revisions	Revisions/Markups