

# Not a Foreign Concept: Court Orders Production of Native ESI Files to Verify That Data Had Not Been Manipulated

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A common issue in almost any case involving the production of electronically stored information (“ESI”) is the format in which the parties will produce the ESI. Typically, ESI may be produced in one of four formats: native (the format in which it is maintained on the producing party’s system – e.g. a Microsoft Word or Excel file), near-native (files that need to be converted to a different file type for production purposes – e.g. converting emails from a .msg file to a .html file), image (e.g. TIFF images or PDF files), or hard copy. A main difference between these formats is the amount, if any, of metadata that is produced with the file. In layperson terms, metadata is information embedded in the ESI that describes certain characteristics of the electronic file (e.g. how, when and by whom it was received, created, accessed, and/or modified and how it is formatted). The production of native files typically includes most metadata associated with a document; near-native may include some or most; image format does not include metadata but may include a load file that contains certain select fields of metadata; and hard copy paper productions generally do not include any metadata... [Continue Reading](#)