EXHIBIT 18

New York City
Law Department

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E-Discovery

The E-Discovery Division consists of attorneys, project managers and e-discovery analysts who work with case teams and agency counsel to meet the Law Department's e-discovery needs. Its members provide legal and technical guidance and services to assist in all aspects of e-discovery – helping to develop strategy, implement legal holds, collect and process electronic data, set up document reviews, apply advanced analytical tools and run document productions. They also help during negotiations with opposing counsel, at court conferences, drafting papers, and wherever their expertise in e-discovery and the governing law and rules may be helpful.

As different forms of electronic documents and communications become increasingly common throughout City agencies, the volume of electronic data that must be collected, reviewed and produced in each case is increasing rapidly. The E-Discovery Division manages that data, handling several hundred document productions each year. To do so, it processes many terabytes of data, consisting of tens of millions of documents. Its work allows the City to meet its e-discovery obligations while ensuring efficiency and defensibility throughout the process.