

**IN THE CIRCUIT COURT OF THE
SEVENTEENTH JUDICIAL CIRCUIT, IN
AND FOR BROWARD COUNTY, FLORIDA**

**Case No: 12-034123(07)
Complex Litigation Unit**

P&S ASSOCIATES, GENERAL PARTNERSHIP,
a Florida limited partnership; and S&P
ASSOCIATES, GENERAL PARTNERSHIP, a
Florida limited partnership, PHILIP VON KAHLE
as Conservator of P&S ASSOCIATES, GENERAL
PARTNERSHIP, a Florida limited partnership, and
S&P ASSOCIATES, GENERAL PARTNERSHIP,
a Florida limited partnership

Plaintiffs,

v.

MICHAEL D. SULLIVAN, an individual,
STEVEN JACOB, an individual, MICHAEL D.
SULLIVAN & ASSOCIATES, INC., a Florida
corporation, STEVEN F. JACOB, CPA &
ASSOCIATES, INC., a Florida corporation,
FRANK AVELLINO, an individual, MICHAEL
BIENES, an individual, KELCO FOUNDATION,
INC., a Florida Non Profit Corporation, VINCENT
T. KELLY, an individual, VINCENT BARONE, an
individual, EDITH and SAM ROSEN, individuals,
PREMIER MARKETING SERVICES, INC., a
Florida Corporation, and SCOTT HOLLOWAY, an
individual,

Defendants.

**PLAINTIFFS' NOTICE OF TAKING DEPOSITION
DUCES TECUM OF RACHEL ROSENTHAL LEIRSCH**

TO: ALL COUNSEL LISTED ON CERTIFICATE OF SERVICE

 **BERGER SINGERMAN**

1450 BRICKELL AVENUE | SUITE 1900 | MIAMI, FLORIDA 33131-3453
t: 305-755-9500 | f: 305-714-4340 | WWW.BERGERSINGERMAN.COM

PLEASE TAKE NOTICE that the undersigned attorneys will take the deposition of:

Deponent	Date	Time	Location
Rachel Rosenthal Leirsch	Tuesday, October 21, 2014	9:30 a.m.	Veritext Legal Solutions 1250 Broadway, Suite 2400 New York, New York 10001

Said deposition will be taken before a Notary Public or any officer authorized to administer oaths in the State of New York, and a person who is neither a relative nor employee of such attorney or counsel, and who is not financially interested in this action. The deposition is being taken for the purpose of discovery, for use at trial, or for such other purposes as are permitted under the Rules of Court.

Deponent is requested to bring those documents set forth in the Subpoena attached hereto as **Exhibit 1**.

The deposition will continue from day to day until completed and will be recorded via stenographic means.

September 17, 2014

Respectfully submitted,

BERGER SINGERMAN LLP
Attorneys for Plaintiffs
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cc: Veritext Legal Solutions

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 17th day of September, 2014, a true and correct copy of the foregoing document was served on the following parties:

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By: s/Steven D. Weber
Steven D. Weber

EXHIBIT 1

SUPREME COURT OF THE STATE OF
NEW YORK COUNTY OF NEW YORK

-----x

P&S ASSOCIATES, GENERAL
PARTNERSHIP, a Florida limited partnership;
S&P ASSOCIATES, GENERAL
PARTNERSHIP, a Florida limited partnership;
Philip von Kahle as Conservator of P&S
ASSOCIATES, GENERAL PARTNERSHIP,
a Florida limited partnership; and S&P
ASSOCIATES, GENERAL PARTNERSHIP,
a Florida limited partnership,

Case No. 12-034123 (07) - Pending
In the Circuit Court of the 17th Judicial Circuit
In and for Broward County, Florida

Plaintiffs,

-against -

MICHAEL D. SULLIVAN, et al.,

Defendants.

-----x

**SUBPOENA FOR DEPOSITION *DUCES TECUM*
OF RACHEL ROSENTHAL LEIRSCH**

STATE OF NEW YORK:

To All Singular Sheriffs of Said State:

**TO: RACHEL ROSENTHAL LEIRSCH
655 Park Avenue, Apartment 5B
New York, New York 10021**

YOU ARE HEREBY COMMANDED appear at the offices of Veritext Legal Solutions, 1250 Broadway, Suite 2400, New York, New York 10001, on October 21, 2014 at 9:30 a.m. and to have with you at that time and place the documents listed on **Schedule "A"** attached hereto (**Documents should be produced on or before October 13, 2014 to the attention of Veritext Legal Solutions, 1250 Broadway, Suite 2400, New York, New York 10001**). All electronically stored information ("ESI"), as defined herein, shall be produced in accordance with the definitions and instructions.

These items will be inspected and may be copied at that time. You will not be required to surrender the original items. 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 appear or bring the documents listed on Schedule A, you may be in contempt of Court.

You are subpoenaed to appear by the following attorneys and unless excused from this subpoena by these attorneys or the Court, you shall respond to this Subpoena as directed.

Dated: September 15, 2014

STEVEN D. WEBER

For the Court

By: s/ Steven D. Weber
BERGER SINGERMAN LLP
New York Bar No. NY# 4454880
Attorneys for Plaintiffs
350 East Las Olas Blvd, Suite 1000
Fort Lauderdale, FL 33301
Telephone: (954) 525-9900
Facsimile: (954) 523-2872

SCHEDULE “A”
DEFINITIONS AND INSTRUCTIONS

The following definitions shall apply to this Request:

A. “You”, “Your” or “Deponent” as used herein means Rachel Rosenthal and/or Rachel Rosenthal Leirsch and/or Rachel Leirsch and includes any and all agents, employees, servants, officers, directors, attorneys and any other person or entity acting or purporting to act on his behalf, or any other entity or person under the direct control of Rachel Rosenthal and/or Rachel Rosenthal Leirsch and/or Rachel Leirsch.

B. “P&S” as used herein means Plaintiff P&S Associates, General Partnership, and includes any and all agents, employees, servants, officers, directors, attorneys and any other person or entity acting or purporting to act on its behalf.

C. “S&P” as used herein means Plaintiff S&P Associates, General Partnership, and includes any and all agents, employees, servants, officers, directors, attorneys and any other person or entity acting or purporting to act on its behalf.

D. “Avellino” as used herein means Frank Avellino, a named Defendant in this action.

E. “Bienes” as used herein means Michael Bienes, a named Defendant in this action.

F. “A&B” as used herein means the partnership Avellino & Bienes that was registered under the laws of the State of Florida.

G. “Sullivan” as used herein means Michael Sullivan, a named Defendant in this action.

H. “Powell” as used herein means Greg Powell.

I. “Mrs. Avellino” as used herein means Nancy C. Avellino.

J. “Mrs. Bienes” as used herein means Dianne K. Biennes.

K. “Madoff” as used herein means Bernard L. Madoff.

L. “BLMIS” as used herein means Bernard L. Madoff Investment Securities LLC.

M. “Picard Complaint” as used herein means the complaint filed in the matter Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Frank J. Avellino, et. al., Adv. Pro. No. 10-05421 filed in the United States Bankruptcy Court for the Southern District of New York.

N. “Person” as used herein means any natural person or any entity, including without limitation any individual, present and former director, officer, employee, contractor, firm, corporation, company, joint venture, trust, tenancy, association, partnership, business, agency,

department, bureau, board, commission, or any other form of public, private or legal entity. Any reference herein to any public or private company, partnership, association, or other entity include such entity's subsidiaries and affiliates, as well as the present and former directors, officers, employees, attorneys, agents and anyone acting on behalf of, at the direction of, or under the control of the entity, its subsidiaries or its affiliates.

O. "Documents" shall mean the original or copies of any tangible written, typed, printed or other form of recorded or graphic matter of every kind or description, however produced or reproduced, whether mechanically or electronically recorded, draft, final original, reproduction, signed or unsigned, regardless of whether approved, signed, sent, received, redrafted, or executed, and whether handwritten, typed, printed, photostated, duplicated, carbon or otherwise copied or produced in any other manner whatsoever. Without limiting the generality of the foregoing, "Documents" shall include correspondence, letters, telegrams, telexes, mailgrams, memoranda, including inter-office and intra-office memoranda, memoranda for files, memoranda of telephone or other conversations, including meetings, invoices, reports, receipts and statements of account, ledgers, notes or notations, notes or memorandum attached to or to be read with any Document, booklets, books, drawings, graphs, charts, photographs, phone records, electronic tapes, discs or other recordings, computer programs, printouts, data cards, studies, analysis and other data compilations from which information can be obtained. Copies of Documents, which are not identical duplications of the originals or which contain additions to or deletions from the originals or copies of the originals if the originals are not available, shall be considered to be separate documents.

P. Documents, as defined herein, includes electronically stored information, which shall be produced in its native format including its metadata, in the manner set forth on **Schedule "A"**.

Q. "Communications" shall mean any oral or written statement, dialogue, colloquy, discussion or conversation and, also, means any transfer of thoughts or ideas between persons by means of documents and includes any transfer of data from one location to another by electronic or similar means.

R. "Concerning" shall mean, directly or indirectly, relate to, refer to, reflect, mention, describe, pertain to, arise out of or in connection with or in any way legally, logically, or factually be connected with the matter discussed.

S. "Identify" as used herein shall mean:

when used in reference to an individual, to state his full name, his present or last known address, his telephone number, the full name and present or last known address of his employer or business, and his position with such employer or business.

1. when used in reference to a corporation, partnership, unincorporated association, or other entity, to state its full name and its present or last known address, and fully describe the business or activity in which the entity is engaged.

2. when used in reference to a document, to state the date, author, type of document, the person or persons to whom it or copies of it were sent, and its present or last known location and custodian. If any document was, but is no longer, in your possession or custody or subject to your control, state what disposition was made of it, the date of such disposition, and the reason for such disposition.
3. in the case of an agreement, its date, the place where it occurred, the identity of all persons who were parties to the agreement, the identity of each person who has knowledge of the agreement and all other persons present when it was made, and the subject matter of the agreement.
4. when used in reference to a statement, a representation, a directive or other information, state the time and date it was made, the location where it was made, the location where it was received (if other than the location where it was made), and the nature and specific content of it, and identify each person to whom it was made, each person present when it was made or received, and each person having care custody or control or it in any form.

T. As used herein, the conjunctions “and” and “or” shall be interpreted in each instance as meaning “and/or” so as to encompass the broader of the two possible constructions, and shall not be interpreted disjunctively so as to exclude any information or documents otherwise within the scope of any Request.

U. When appropriate, the singular form of a word should be interpreted in the plural as may be necessary to bring within the scope hereof any documents which might otherwise be construed to be outside the scope hereof.

V. Any pronouns used herein shall include and be read and applied as to encompass the alternative forms of the pronoun, whether masculine, feminine, neuter, singular or plural, and shall not be interpreted so as to exclude any information or documents otherwise within the scope of the Request.

W. If you assert that any document called for by a Request is protected against disclosure on the grounds of the attorney work product doctrine or by the attorney-client privilege, or any other assertion of privilege, you must provide the following information with respect to such document:

1. the name and capacity of the person or persons who prepared the documents;
2. the name and capacity of all addresses or recipients of the original or copies thereof;

3. the date, if any, borne by the document;
4. a brief description of its subject matter and physical size;
5. the source of the factual information from which such document was prepared;
and
6. the nature of the privilege claimed.

X. You must produce all Documents within Your possession, care, custody or control that are responsive to any of these Requests. A Document is deemed within Your care, custody or control if You have the right or ability to secure the document or a copy thereof from any other person having physical possession thereof.

Y. All Documents produced pursuant hereto are to be produced as they are kept in the usual course of business and shall be organized and labeled (without permanently marking the item produced) so as to correspond with the categories of each numbered request hereof.

Z. Production of Electronically Stored Information (“ESI”) or any electronically stored data shall be in native format unless otherwise agreed. 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.

AA. It is requested that all ESI be produced as native files and single-page TIFF images with corresponding load files. Each image and native file shall be produced along with its corresponding metadata and extracted text.

BB. Each hard copy Document is to be produced, with all non-identical copies and drafts thereof, in its entirety, without alteration, abbreviation or reduction and shall be produced either in the manner they are kept in the usual course of business or organized to correspond with the Request to which they are responsive. If any Document is produced in redacted form, state with particularity the reason(s) it was not produced in full and describe generally those portions of the Document that are not being produced

CC. All Documents that respond, in whole or in part, to any part or clause of any paragraph of these Requests shall be produced in their entirety, including all attachments and enclosures. Only one copy need be produced of Documents that are responsive to more than one paragraph or are identical except for the person to whom it is addressed if You indicate the Persons or group of Persons to whom such Documents were distributed. Documents that in their original condition were stapled, clipped, or otherwise fastened together shall be produced in such form. Please place the Documents called for by each paragraph in a separate file folder or other enclosure marked with Respondents’ name and the paragraph to which such Documents respond, and if any Document is responsive to more than one Request, indicate each Request to which it responds.

DD. If you at any time had possession, custody or control of a Document called for under these Requests and if such Document has been lost, destroyed, purged, or is not presently

in your possession, custody or control, you shall describe the Document, the date of its loss, destruction, purge, or separation from possession, custody or control and the circumstances surrounding its loss, destruction, purge, or separation from possession, custody or control.

EE. Unless otherwise specified herein, the time frame for each Request is from and including January 1, 1960 to the present.

DOCUMENTS REQUESTED

1. All transcripts of examinations of You, Avellino, Mrs. Avellino, Bienes, Mrs. Bienes, and/or Thomas Avellino pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure.
2. All transcripts and/or documents containing sworn testimony by You, Avellino, Mrs. Avellino, Bienes, Mrs. Bienes, and/or Thomas Avellino.
3. All documents related to Avellino, Bienes, Mrs. Avellino, Mrs. Bienes and/or Thomas Avellino knowing or should have knowing that BLMIS was acting fraudulently.
4. All documents related to Avellino, Bienes, Mrs. Avellino, Mrs. Bienes and/or Thomas Avellino knowing or should have knowing that Madoff and BLMIS were operating a fraudulent investment advisory business.
5. All documents related to S&P and/or P&S.
6. All documents related to Michael D. Sullivan, and/or Greg Powell.
7. All documents related to BLMIS and/or Madoff.
8. All documents exchanged between BLMIS and You, Avellino, Bienes, Mrs. Bienes, Thomas Avellino, and/or Mrs. Avellino.
9. All documents exchanged between Madoff and You, Thomas Avellono, Avellino, Bienes, Mrs. Bienes, and/or Mrs. Avellino.
10. All documents related to investment advisory accounts maintained by A&B with BLMIS with the following account numbers: 1A0045, 1A0046, 1A0047, 1A0049, 1A0050, and 1A0053, 1ZB046, 1ZB509.
11. All documents related to Grosvenor Partners, Ltd.
12. All documents related to Aster Associates.

13. All documents related to St. James Associates.
14. All documents related to Mayfair Ventures, G.P.
15. All documents related to Kenn Jordan Associates.
16. All documents related to Strattham Partners.
17. All documents related to Ascent, Inc.
18. All documents related to Mayfair Bookkeeping Services, Inc.
19. All documents related to Mayfair Pension Plan.
20. All documents related to payments, transfers of funds, and or compensation that that You; Thomas Avellino; Avellino; Bienes; Mrs. Bienes; Mrs. Avellino; Grosvenor Partners, Ltd.; Aster Associates; St. James Associates; Mayfair Ventures, G.P; Kenn Jordan Associates; Strattham Partners; Ascent, Inc.; Mayfair Bookkeeping Services, Inc.; and/or Mayfair Pension Plan received from BLMIS and/or Madoff.
21. All documents related to payments, transfers of funds, and or compensation that that BLMIS and/or Madoff received from You; Thomas Avellino; Avellino; Bienes; Mrs. Bienes; Mrs. Avellino; Grosvenor Partners, Ltd.; Aster Associates; St. James Associates; Mayfair Ventures, G.P; Kenn Jordan Associates; Strattham Partners; Ascent, Inc.; Mayfair Bookkeeping Services, Inc.; and/or Mayfair Pension Plan.
22. All documents related to BLMIS and/or Madoff exchanged between You and Thomas Avellino; Avellino; Bienes; Mrs. Bienes; Mrs. Avellino; Grosvenor Partners, Ltd.; Aster Associates; St. James Associates; Mayfair Ventures, G.P; Kenn Jordan Associates; Strattham Partners; Ascent, Inc.; Mayfair Bookkeeping Services, Inc.; and/or Mayfair Pension Plan.
23. All documents exchanged between BLMIS and/or Madoff and Grosvenor Partners, Ltd.; Aster Associates; St. James Associates; Mayfair Ventures, G.P; Kenn Jordan

Associates; Strattham Partners; Ascent, Inc.; Mayfair Bookkeeping Services, Inc.; and/or Mayfair Pension Plan.

24. All documents related to any investment accounts opened at BLMIS and/or any investment accounts opened with Madoff.

25. All documents related to investment accounts opened with Madoff and/or investment accounts at BLMIS exchanged between Frank DiPascali and You; Thomas Avellino; Avellino; Bienes; Mrs. Bienes; Mrs. Avellino; Grosvenor Partners, Ltd.; Aster Associates; St. James Associates; Mayfair Ventures, G.P; Kenn Jordan Associates; Strattham Partners; Ascent, Inc.; Mayfair Bookkeeping Services, Inc.; and/or Mayfair Pension Plan.

26. All documents related to any bank accounts that were used to pool money for investment in BLMIS and/or with Madoff.

27. All documents related to any bank accounts that were used to make payments and/or transfers to BLMIS and/or Madoff. This request includes without limitation financial statements, bank account statements, or other memorializing documents.

28. All documents related to any bank accounts that were used to receive payments and/or transfers from BLMIS and/or Madoff. This request includes without limitation financial statements, bank account statements, or other memorializing documents.

29. All documents related to any bank accounts that were used to receive payments and/or transfers from Grosvenor Partners, Ltd.; Aster Associates; St. James Associates; Mayfair Ventures, G.P; Kenn Jordan Associates; Strattham Partners; Ascent, Inc.; Mayfair Bookkeeping Services, Inc.; and/or Mayfair Pension Plan. This request includes without limitation financial statements, bank account statements, or other memorializing documents.

30. All documents related to any bank accounts that were used to receive payments and/or transfers from Grosvenor Partners, Ltd.; Aster Associates; St. James Associates; Mayfair Ventures, G.P; Kenn Jordan Associates; Strattham Partners; Ascent, Inc.; Mayfair Bookkeeping Services, Inc.; and/or Mayfair Pension Plan. This request includes without limitation financial statements, bank account statements, or other memorializing documents.

SCHEDULE “A”

**Production of Electronically Stored Information (ESI)
FORM OF PRODUCTION**

Plaintiffs, P & S Associates, General Partnership (“P&S”), S & P Associates, General Partnership (“S&P”), (collectively referred to as, the “Partnerships”), and Philip Von Kahle as Conservator on behalf of the Partnerships (the “Conservator”, and collectively with the Partnerships, the “Plaintiffs/Judgment Creditors”), requests that all ESI (electronically stored information) be produced as follows:

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

The files should be delivered with the following folder structure:

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

<u>Eclipse Metadata Field</u>	<u>Field Description</u>
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 .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