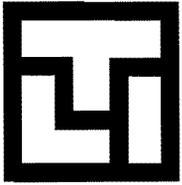


General



300 UNION BOULEVARD, SUITE 600, LAKEWOOD, CO 80228

PHONE: (303) 763-7188
FAX: (303) 763-4896

TECHLAW INC.

December 20, 2001



Mr. John Kieling
Hazardous Waste Bureau
New Mexico Environmental Department
2905 Rodeo Park Drive East
Santa Fe, New Mexico 87505-6303

RE: Transmittal of Proposal for Document Processing Services

Dear Mr. Kieling:

TechLaw, Inc. is pleased to present this proposal for document processing to the New Mexico Environmental Department (NMED) for the automation of the Administrative Record (AR) for the Los Alamos National Laboratory (LANL) Resource Conservation and Recovery Act (RCRA) Part B Permit Application. This project includes the imaging, coding and OCR processing of at approximately 400,000 pages of permit application documents. The 400,000 pages represent an estimated 6,500 documents that have been previously coded in a FileMaker Pro database. In order to make this information available to the public and interested parties for comment as part of the Permit process, the documents will be converted to an electronic format to allow ease of retrieval, easy public access, and reasonable document security.

The AR Documents are currently located at NMED's office in Santa Fe, New Mexico. The documents will be assembled in the order of the database and document numbers assigned by inserting slip-sheets prior to processing.

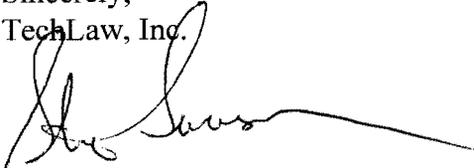
The result of the proposed services will be an image-based document retrieval system that will enable NMED to search for, view and print images of the AR documents.

32396



If you have any questions, please call Wally O'Rear (214) 572-0069 or June Dreith or me at (303) 763-8881 or 1-800-873-7411.

Sincerely,
TechLaw, Inc.

A handwritten signature in black ink, appearing to read "Steve Swanson", with a long horizontal flourish extending to the right.

Steve Swanson
Senior Staff Consultant

Enclosure
IF: 77400-001

*Proposal to the New Mexico
Environmental Department for
Document Processing Services*

TechLaw, Inc.
300 Union Boulevard, Suite 600
Lakewood, CO 80228
December 20, 2001



PROPOSAL TO THE NEW MEXICO ENVIRONMENTAL DEPARTMENT FOR DOCUMENT PROCESSING SERVICES

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PROPOSAL TO THE NEW MEXICO ENVIRONMENTAL DEPARTMENT FOR DOCUMENT PROCESSING SERVICES

TechLaw, Inc. is pleased to present this proposal for document processing to the New Mexico Environmental Department (NMED) for the automation of the Administrative Record (AR) for the Los Alamos National Laboratory (LANL) Resource Conservation and Recovery Act (RCRA) Part B Permit Application. This project requires the imaging, coding and OCR processing of at approximately 400,000 pages of permit application documents. The proposed tasks for automation of this project to develop an image-enabled database include, but are not limited to:

- Document Tracking
- Document Preparation & Batch Level Coding
- Image scanning, including quality control
- Image Archive to CD
- OCR Processing
- Electronic Number Endorsement
- Linking of previously coded documents to their images
- Creation of PDF files for the electronic images
- Database building and image/OCR linking for various deliverable formats
- Data Copying and Delivery

TechLaw has experience in providing data and images in Adobe Acrobat (PDF) and most, if not all, non-proprietary image and database formats. Additionally, because our production systems are designed to produce raw data in generic formats, we are particularly well positioned to output data to a wide range of deliverable formats quickly. Images, coded data, and the OCR text will be delivered on CD-ROM media. TechLaw is experienced in delivering databases to most, if not all, non-proprietary databases and image viewers including Concordance, Summation, BRS, IRPO, Opticon and Doculex, as well as many others.

The result of the proposed services will be an image-based document retrieval system that will enable the Client to search for, view and print images of the AR documents.

We believe key characteristics of a successful project include accountability, quality control, and vendor experience. Our experience in managing large volume, image-based database projects during the last 12 years has yielded a depth of experience, rich with knowledge of what works and what doesn't, and how to maintain a high-volume, high-quality production environment. TechLaw is confident that our range of capabilities, including document processing services built around the imaging component and our extensive experience with the retrieval products that will be used in this project, qualify us to be your vendor of choice. We offer the quality and service that can only be expected from a stable, consistently profitable corporation with years of experience managing projects.

PROJECT BACKGROUND

NMED has assembled an estimated 400,000 pages of documents in support of the Resource Conservation and Recovery Act (RCRA) Part B Permit Application (Permit) in the AR. This data has been previously coded by NMED and TechLaw personnel in a FileMaker Pro database. The fields of data that are currently coded include:

- **Facility ID; 1253**
- **Facility Name: LANL**
- Entry Date:
- EMER:
- HWB Document
- Entry Person's Initials:
- LAUR
- HWB Completed
- Correspondence Type:
- AOC Letter:
- EPA Document:
- Date on Correspondence:
- Task Number:
- EPA Completed:
- Date Correspondence Received:
- AR/Invoice Number:
- From:
- File Type:
- Appendix:
- To:
- Subject
- Site:
- Appendix
- Facility ID
- File Code
- FU:
- OU:
- TA:

The current number of records coded is between 5,500 and 6,500 documents (the number of pages and documents are estimated as 6,500 documents and 400,000 pages for the remainder of this proposal). In order to make this information available to the public and interested parties for comment as part of the Permit process, the documents will be converted to an electronic format to allow ease of retrieval, easy public access, and reasonable document security.

The AR Documents are currently located at NMED's office in Santa Fe, New Mexico. The documents will be assembled in the order of the database and document numbers

assigned by inserting slip-sheets prior to boxing and shipping to TechLaw's Document Processing Center in Denver, Colorado for scanning.

The remainder of the proposal contains the following:

- 1.0 Cost Proposal**
- 2.0 Corporate and Personnel Information**
- 3.0 Technical Plan and Approach**

1.0 COST PROPOSAL

This section of the proposal provides information on the estimated costs to accomplish the creation of an electronic AR document collection. It is divided into the following sections:

- 1.1 ASSEMBLY OF THE CURRENT DOCUMENT SET**
- 1.2 SCANNING OF THE DOCUMENT SET**
- 1.3 OCR CONVERSION OF THE ELECTRONIC IMAGES**
- 1.4 LINKING THE SCANNED IMAGES TO THE CODED DATABASE**
- 1.5 CREATION OF AN ELECTRONIC BATES STAMP**
- 1.6 CD-ROM CREATION**
- 1.7 DELIVERABLES**
- 1.8 CREATION OF A WEB BASED AR**
- 1.9 ADDING NEW DOCUMENTS TO THE AR FILE**
- 1.10 TOTAL PROPOSED COST OF THE PROJECT**

1.1 ASSEMBLY OF THE CURRENT DOCUMENT SET

The documents will be assembled to correspond to the coded database with slip-sheets inserted to indicating the appropriate or corresponding record number. This task will be accomplished by TechLaw and NMED personnel in Santa Fe. Our estimated costs include TechLaw employee Mark Edge for an estimated four weeks

TechLaw Costs for Assembly of the Current Document Set \$16,000.00

1.2 SCANNING OF THE DOCUMENT SET

Estimating 400,000 pages with 6,500 documents results in an average of 61.5 pages per document. TechLaw typically estimates that 2,000 pages fit in a box; therefore, the boxed documents will fill 200 boxes. It is also assumed that most of the document set will be in 3-ring binders with pages that may be one-sided or two-sided. The documents also contain maps or figures, some of which may be larger than standard 8 1/2" x 11" paper, and which may also be in color.

There are several options that need to be considered in the process before scanning. They fall into two general categories: (1) creating a duplicate set of the documents that may be sent to TechLaw's Document Processing Center (DPC) for scanning or (2) utilizing the original documents for scanning either on-site at NMED or at TechLaw's DPC. The cost of these options are discussed in the following subsections.

1.2.1 Creating a Duplicate Set of the Documents

The purpose behind creating a duplicate set of documents is to provide a set for scanning allowing the original documents to remain, for the most part in place. The down side to this is the cost of the creation of the second set and errors that occur in the second set

such as missing/misfiled pages and poor quality. A duplicate set of the Permit documents could be created either off-site by a local Santa Fe contractor (we obtained an estimates from Kinkos in Santa Fe), on-site by TechLaw, or by the State of New Mexico.

1.2.1.1 Option 1: Off-Site Copying of the Documents

This option would involve the physical movement of the boxes between the NMED office and the local copy office. The off-site copying company has included the cost of moving the boxes in this cost estimate.

Cost per page including document disassembly and reassembly	
400,000 pages x \$0.08 per page	\$32,000.00
Sales Tax 5.81%	1,859.20
Transportation to and from Copy Service	Included
Cost of purchasing 200 Boxes	\$635.08
Subtotal Cost for Reproducing a Set of the AR Documents	
Off-Site	\$34,494.28
TechLaw G&A 15%	5,174.14
Total Estimated Off-Site Copy Cost	\$37,668.42

1.2.1.2 Option 2: Documents Copied On-Site by TechLaw

Option 2 would utilize TechLaw personnel supervising the creation of a duplicate set of the documents on-site at the NMED offices. Requirements for this option would include: space for as many as five copiers, power outlets or modification of power outlets to allow for the copiers operation, and space for as many as six employees and temporary employees. TechLaw estimates that 2,500 pages per copy machine per day could be copied. With five copiers producing 12,500 copies per day, it would require 32 working days or 6.5 weeks to complete the work. Included in this option are the following costs:

Rental of Five Copiers	
\$425 per machine for delivery, set-up and pick-up	\$2,125.00
\$590 per machine per month, 5 machines, 2 months	5,900.00
Copy charge \$0.05 per page over 15,000 per month per copier 250,000 pages x \$0.05	12,500.00
Sales Tax on Copier Rental 5.81%	1,192.50
Copy Paper - 5,000 pages per box required 80 boxes per box cost \$26.50 x 80 boxes	2,120.00
Sales Tax on Paper 5.81%	123.17
Subtotal Copier Costs	\$23960.67
TechLaw G&A 15%	3,846.75
Total Copier Costs	\$26,041.75
Other Direct Costs	
Five temporary employees for 6.5 weeks at \$24 hour	\$31,200.00
Per diem, Travel, etc.	7,910.00

Subtotal for On-Site Copying	39,110.00
TechLaw G&A 15%	5,866.50
Total Other Direct Costs	\$44,976.50
Labor	
TechLaw Manager \$75 per hour 7 weeks	21,000.00
Total Estimated On-Site Copy Costs TechLaw	
Total Copier Costs	\$26,041.75
Total Other Direct Costs	44,976.50
TechLaw Manager	21,000.00
Total Estimated Cost	\$92,018.25

1.2.1.3 Option 3: Documents Copied On-Site by the State of New Mexico

TechLaw has no information on internal copy cost and requirements that may be present in the State of New Mexico. This option is presented only as noting that this option may exist.

1.2.2 Scanning of the Documents

The following costs include scanning either the duplicate set of documents described in Options 1 - 3 above or scanning the original set of documents describes in Options 4 - 6.

1.2.2.1 Scanning a Duplicate Set of Documents

The estimated costs in the following subsections assume that a duplicate set of documents are used to scan the AR Permit documents at a TechLaw DPC.

- **Option 4: Scanning the Off-Site or On-Site Created Duplicate Set of Documents**

The cost of scanning the documents at a DPC include:

Document Prep	None, accomplished by Copying
Doc Reassembly	None, accomplished by Copying
Scanning (Mixed Quality) \$0.12 pre page	\$48,000.00
One Level Binding Flagging \$0.02 per page	8,000.00
QC \$0.06 per page	24,000.00
Subtotal for Scanning Only	\$80,000.00

Cost for Scanning Off-Site Created Duplicate Set of Document

Off site Copy Cost	\$37,668.42
Scanning of Documents	80,000.00
Subtotal	\$117,668.42

Cost for Scanning On-Site Created Duplicate Set of Document

Off site Copy Cost	\$95,468.25
Scanning of Documents	80,000.00
Subtotal	\$175,468.25

1.2.2.2 Scanning the Original Documents

- **Option 5: Documents Scanned on Site by TechLaw**

The fifth option would allow for the avoidance of the step of creating a duplicate set of the AR documents by scanning on-site. These costs would include:

On-site Scanning Charges	Price
Scanner Set-Up	\$1,000 (single site)
Supervisor	\$425/day
Travel and Per diem	\$7,910.00
Scanning including prep, assembly, & QCR	\$0.24 per page
Document Level Flag	\$0.02 per page
Shipping Equipment - to be determined	Approximately \$500 round trip per scanner

Three scanners. The amount of time to do a project is limited by the number of scanners on the project. An estimated 250 documents per hour could be scanned. TechLaw is assuming there will be three scanning stations. The results in 6,000 pages per day scanned or 67-days to scan the documents. Included in TechLaw's assumption is space provided by NMED sufficient to house scanners, documents in the scanning process, a small network, and a supervisor.

Client Site Imaging Assumptions

- Two weeks notice will be provided prior to client site start-up.
- The client will supply required furniture including two 4' to 6' tables, and one chair per scanner.
- The client will supply 100 s.f. of roughly square contiguous space per scanner.
- Adequate air conditioning/heating exists to keep scanning work area within a constant 65 - 75 degree range.
- Client will provide one dedicated power line (with 20 amp capacity) for each scan station and CPU.
- The Client will provide at least 10 and up to 16 hours of site access every business day.
- The client will provide a continuous flow of paper and will maintain a back-log of documents for scanning to ensure an uninterrupted processing flow. Hourly scan rates of \$30/hour will apply for down time resulting from insufficient boxes to process.
- TechLaw may send a representative to review the client scan site prior to scan station set-up.

Scanning On-Site		
Set Up three scanning units	\$1,000.00 each	\$3,000.00
Shipping Equipment	500.00	1,500.00
Per Diem	85.00	8,330.00
Travel		6,000.00
Subtotal		18,830.00
G&A		2,824.50
OnSite-Shipping, ODCsG&A		\$21,654.50

Supervisory Labor		
Supervisor 14 weeks	425.00 day	41,650.00

Scanning		
Scanning (page)	.24	96,000.00
Document Level Flagging	.02	8,000.00
Subtotal Scanning		\$104,000.00

Total Estimated Costs On-Site Scanning		
OnSite-Shipping, ODCsG&A		\$21,654.50
Supervisor 14 weeks		41,650.00
Scanning		\$104,000.00
Total Estimated On-Site Scanning Costs		\$167,304.50

- **Option 6: Scanning Original Documents at TechLaw DPC**

The final option involves scanning the original documents shipped from the NMED office in Santa Fe to TechLaw's DPC. The cost to do so includes the following:

Shipping:		
Shipping 200 Boxes Round Trip to TechLaw's DPC		
\$35 per box 2 trips		\$14,000.00
G&A 15%		2,100.00
Subtotal Shipping		\$16,100.00

Scanning		
Document Prep \$0.02 per page		\$8,000.00
Doc Reassembly \$0.02 per page		\$8,000.00
Scanning (Mixed Quality) \$0.12 pre page		\$48,000.00
Second Pass QC (Includes Deskew) \$0.06 per page		\$24,000.00
Document Level Flagging \$0.02 per page		8,000.00
Subtotal for Scanning Original Shipped to DPC		\$96,000.00

Total Estimated Scanning Costs DPC with Original Documents		
Shipping, ODCs G&A		\$16,100.00
Scanning		\$96,000.00
Total Estimated On-Site Scanning Costs		\$112,100.00

1.2.3 Comparison of the Estimated Costs for Scanning

1.2.3.1 Cost for Scanning Off-Site Created Duplicate Set of Document

Cost for Scanning Off-Site Created Duplicate Set of Document	
Shipping to the DPC \$35 per box one way only	\$7,000.00
G&A for Shipping 15%	1,050.00
Off site Copy Cost	\$37,668.42
<u>Scanning of Documents</u>	<u>80,000.00</u>
Subtotal	\$125,718.42

1.2.3.2 Cost for Scanning On-Site Created Duplicate Set of Document

Cost for Scanning On-Site Created Duplicate Set of Document	
Shipping to the DPC \$35 per box one way only	\$7,000.00
G&A for Shipping 15%	1,050.00
Off site Copy Cost	\$92,018.25
<u>Scanning of Documents</u>	<u>80,000.00</u>
Subtotal	\$180,068.25

1.2.3.3 Costs for On-Site Scanning Costs

Total Estimated Costs On-Site Scanning	
OnSite-Shipping, ODCsG&A	\$21,654.50
Supervisor 14 weeks	41,650.00
<u>Scanning</u>	<u>\$104,000.00</u>
Total Estimated On-Site Scanning Costs	\$167,304.50

1.2.3.4 Costs for Scanning Originals Shipped to TechLaw DPC

Total Estimated Scanning Costs DPC with Original Documents	
Shipping, ODCs G&A	\$16,100.00
<u>Scanning</u>	<u>\$96,000.00</u>
Total Estimated On-Site Scanning Costs	\$112,100.00

1.2.3.5 Summary of Scanning Cost Options

Cost for Scanning Off-Site Created Duplicate Set of Documents	\$125,718.42
Cost for Scanning On-Site Created Duplicate Set of Documents	\$180,068.25
Costs On-Site Scanning	\$167,304.50
Scanning Costs DPC with Original Documents	\$112,100.00

1.3 OCR CONVERSION OF THE ELECTRONIC IMAGES

TechLaw has specialized in doing high volume OCR conversion since 1988, and was the first company in the industry to provide this service. Intellex OCR processing software, based on Calera/Caere libraries, controls the conversion of image files to ASCII text. During this process, batch label information is automatically added to each text record, along with any image-specific notes. *In addition, the output text files are automatically cross-referenced to the appropriate image files.* As an additional quality control step, any images which fail the OCR process on their first pass are logged and reprocessed.

Accuracy of OCR processing is, of course, dependent upon the quality of the original document. Certain quality control steps are taken, including enhancement of the image during the scanning process, as well as optional deskewing and despeckling the image, to create the best possible image prior to archiving. Our latest version of OCR software achieves an average increase in OCR accuracy of more than 10%, with no manual review or keying, and excels particularly at recognizing moderate to poor quality text. This is accomplished in part through a unique re-processing approach that isolates suspect character strings and goes through multiple passes with intermediate image adjustments. Finally, our software will output a percentage accuracy confidence factor, which may be used to identify documents that may require further indexing.

OCR of Documents \$0.10 per page \$40,000.00

1.4 LINKING THE SCANNED IMAGES TO THE CODED DATABASE

The images will be linked to the current coded database.

\$0.02 per page \$8,000.00

1.5 CREATION OF AN ELECTRONIC BATES STAMP

A unique identifier code will be associated with each agreement. The identifier code and format will be determined. Included in the previous costs, no extra charge.

1.6 CD-ROM CREATION

Depending on the condition of images, each CD-ROM, on average, can hold between 5,000 to 15,000 images. It is estimated that the images for this project will require approximately 40 CD-ROM discs, a few more CD-ROM discs will be required for OCR text and other project deliverables.

40 CD-ROMs at \$30.30 each, creating 2-sets \$2,424.00

1.7 DELIVERABLES

Scanned images of all documents sent to your NMED on CD-ROM media in PDF (image plus hidden text format). The existing coded information will be linked to their corresponding images, and will be placed on CD-ROM.

1.8 CREATION OF A WEB BASED AR

Once the documents are produced in the electronic format, they are capable of being accessed either through an image-enabled database or the internet. For a web based AR, TechLaw recommends a dedicated server through which the images may be accessed. The cost of placing the AR on the web is dependent upon whether NMED wishes to place the files on their own server (for which there is no further cost) or if NMED wishes TechLaw to provide this service. If NMED wishes, TechLaw will host the information on a server maintained by TechLaw, the charges for which will be dependent on the estimated size of the file, the estimated number of monthly visits, the maximum number of visits at one time, and a monthly maintenance fee.

1.9 ADDING NEW DOCUMENTS TO THE AR FILE

Adding new documents to the AR file is not difficult, nor expensive. New documents may be scanned, OCR'd, etc. at the rates discussed above. New documents may be added in batches to new CDs as the file is updated periodically.

1.10 TOTAL PROPOSED COST OF THE PROJECT

Scanning an Off-Site Created Duplicate Set of Documents	
Assembly of the Document Set	\$16,000.00
Scanning the Duplicate Set of Documents	\$125,718.42
OCR	40,000.00
Linking the scanned images to the database	8,000.00
Electronic Bates Stamp	Included
40-CD-ROMS	\$2,424.00
TOTAL	\$192,142.42

Scanning On-Site Created Duplicate Set of Documents	
Assembly of the Document Set	\$16,000.00
Scanning the Duplicate Set of Documents	180,068.25
OCR	40,000.00
Linking the scanned images to the database	8,000.00
Electronic Bates Stamp	Included
40-CD-ROMS	\$2,424.00
TOTAL	\$246,492.25

On-Site Scanning of Original Documents	
Assembly of the Document Set	\$16,000.00

Scanning the Original Documents On-Site	167,304.50
OCR	40,000.00
Linking the scanned images to the database	8,000.00
Electronic Bates Stamp	Included
40-CD-ROMS	\$2,424.00
TOTAL	\$233,728.50

Scanning Costs at DPC with Original Documents

Assembly of the Document Set	\$16,000.00
Scanning Original Documents at DPC	\$112,100.00
OCR	40,000.00
Linking the scanned images to the database	8,000.00
Electronic Bates Stamp	Included
40-CD-ROMS	\$2,424.00
TOTAL	\$162,524.00

2.0 CORPORATE AND PERSONNEL INFORMATION

This section includes information regarding TechLaw's Corporate History and Personnel Qualifications. A table is included (Table 1-1) that summarizes TechLaw personnel information.

2.1 CORPORATE HISTORY

Since 1988, TechLaw has offered a full range of document automation support services, including database design and conversion, complete image processing services (document preparation, image scanning, document unitization, quality control review, archiving to optical disk, optical character recognition of all or portions of the image collection), and document level bibliographic and subjective coding. TechLaw has provided these services for a variety of different database and imaging systems on an array of platforms. Included below are examples of TechLaw's automated document support services.

TechLaw supported the **Army Corp of Engineers in Sacramento** on projects that included a team of up to 14 document analysts/coders and 2 supervisory employees for over one year. This project involved a number of specific tasks including:

- Collection and analysis of approximately 160,000 pages of documentation including logging in documents
- Evaluation of documents for duplicates
- Numbering all documents
- Document control to assure the security of the collection
- Setting up a automated document support center on-site at the offices of USACE
- Assisting USACE Office of Counsel and US Department of Justice attorneys with responding to Stipulations, and Requests for Admissions

TechLaw has had a ten-year working relationship with the **Rocky Flats Environmental Technology Center (RFETC)** located near Denver, Colorado. TechLaw provides a range of legal automation services including scanning, coding and optical character recognition. This support is slated to last until the plant closes in 2007.

Under prime contracts with the **US Environmental Protection Agency**, TechLaw has provided document review and analysis support to every Federal EPA Region nationwide since 1984. From conducting over 1,000 assignments involving environmental enforcement support projects, our staff have extensive experience in reviewing records and developing and integrating databases. We continue to provide this assistance in various regions at this time.

Since its formation in 1983, TechLaw has been a leader in the development, management and use of information and technology in support of clients involved in complex legal, environmental or regulatory matters. TechLaw was among the first companies to bring an

integrated imaging approach to document management, and we have organized hundreds of document-intensive cases through the use of innovative and emerging technologies.

Our development activities extend from the creation, continual upgrade and maintenance of our production systems (scanning, coding, OCR, utilities), to programmatic enhancement of selected third party products used by our clients. Most recently, we have introduced two new services.

2.2 PERSONNEL INFORMATION

This section provides information regarding TechLaw personnel. Included is a discussion of TechLaw’s project management approach, a table providing specific information regarding numbers of coders, number of quality control personnel, number of first-line supervisors, average length of service, and number of project managers and average length of services. Resumes for supervisor and project management staff are presented in this section. For sake of clarity, the specific role of each individual is noted at the top of their resume.

2.2.1 Management Approach

This section discusses TechLaw’s planned management approach, specifically addressing the project management responsibilities. In our experience, a project organization consisting of Project Managers, Supervisors, and project staff — works best (see Figure 1-1: NMED Document Processing Project Organization¹ on the following Page). These elements of organization are designed to efficiently address the needs of this project and provide effective communication with NMED.

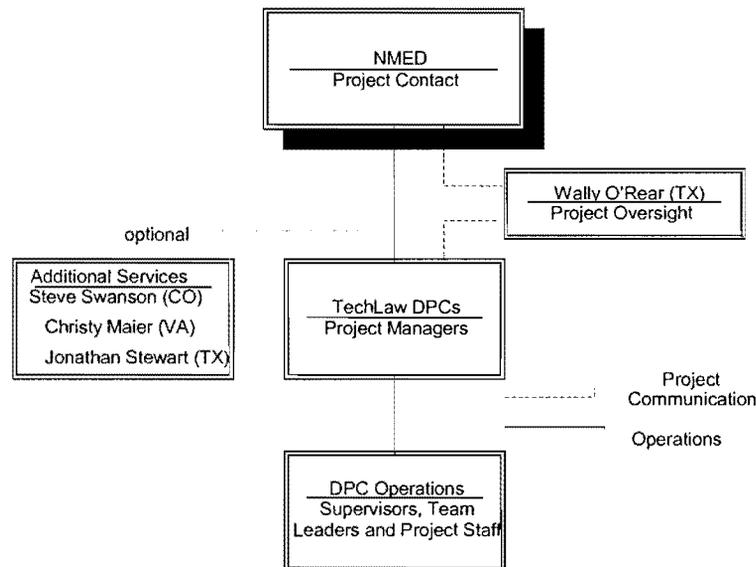


Figure 1-1: NMED Document Processing Project Organization

¹ The state where named staff is located is shown in parenthesis following their name.

In our experience, a project organization consisting of Project Managers, Supervisors, and project staff - works best. These elements of organization are designed to efficiently address the needs of this project and provide effective communication with NMED. Wally O’Rear, Staff Consultant, will serve as the overall project coordinator. His responsibilities include client relations, troubleshooting and resolution, and facilitation of the initiation of the project. He will contact the NMED project contact during the course of the project to solicit feedback on the progress of the work. TechLaw has found this technique to be helpful in that it provides the client with a sounding board and provides a mechanism for us to learn of potential problems and to continue to provide technical support services that meets our client’s needs. TechLaw is committed to sound client relations at the highest corporate level.

The following sections address the management positions proposed for this project. TechLaw’s Document Processing Center Organization is shown in Figure 1-1. TechLaw has three Document Processing Centers with similar capacities and functional capabilities. They are located in Chantilly, Virginia; Dallas, Texas; and Denver, Colorado. Resumes for Project Managers, and first-line Supervisors are included in *Section 2.1.5*.

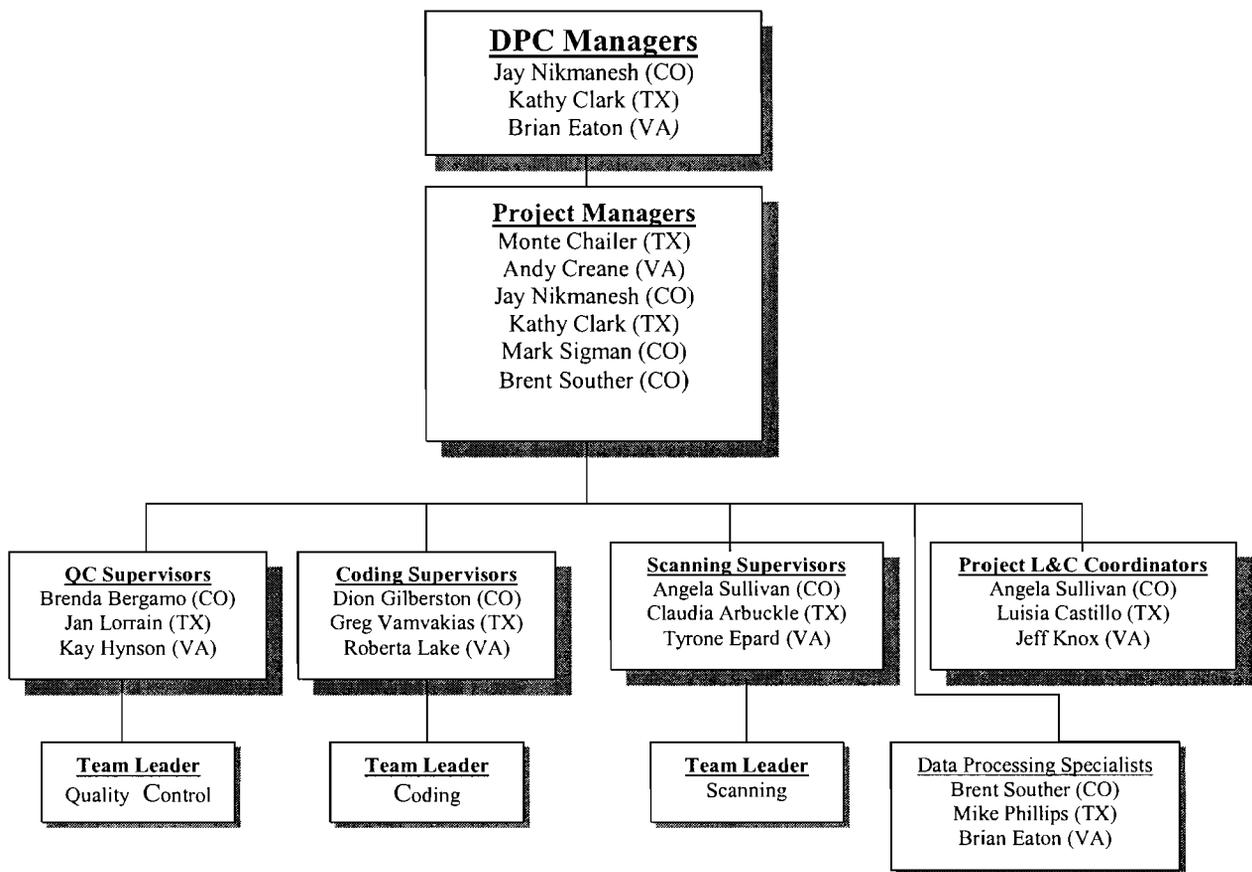


Figure 1-2: Document Processing Centers Management

Our staff represents a deep cross-section of experience, ranging from automated document support professionals seasoned through years of “in-the-trenches” practice, project managers with more than 20 years of providing automated document support services, to production staff hand-picked for their attention to detail and job dedication. Our Team Leaders are required to have at least one year of prior work experience as a Quality Control Clerk and college level analytical skills. Our Quality Control Clerks must have previously demonstrated a high level of accuracy and productivity as a Document Coder. Quality Control Clerks must also have college level analytical skills, have passed a coding test and a management interview, and have demonstrated proficiency on test coding batches prior to work on each project.

2.2.1.1 DPC Managers

TechLaw has three Document Processing Centers (DPCs): Denver, CO, Dallas, TX, and Washington DC. A DPC Manager manages the operations of each Document Processing Center. TechLaw’s DPC Managers have an average of 22.3 years of automated document support experience. The DPC Manager is responsible for overall management including availability of qualified staff, availability of resources for successful project completion and interaction with clients to resolve any issues that might arise. The DPC Managers have overall responsibility for the successful performance of their DPC.

2.2.1.2 Project Managers

The Project Manager’s (PM) principal responsibilities are to ensure that the NMED projects are provided with the necessary project level support, and managing the project overall to assure that the project team is meeting its contractual obligations with the client in a manner that meets or exceeds the client’s expectations. Thus, the PM will resolve any staffing conflicts to ensure that the NMED projects are provided with the necessary number of staff members in the required areas of expertise. The PM will also ensure that the project team is provided with the facilities and the support staff required for effective conduct of the required work.

The PM is responsible for producing weekly project status reports and a monthly invoice. The PM is responsible for keeping NMED Project Manager informed of any issues that may arise during the contract that may affect performance under the contract and to describe solutions that are being pursued. The PM will review the progress of work under the contract on a daily basis. They will seek to identify opportunities to improve the efficiency, quality, and quantity of work performed under the contract and to introduce new ideas for enhanced service to the client within the scope of the contract.

The PM will also confer with the NMED project contact as needed, to discuss program direction and to discuss and resolve any issues that should be addressed at the project level. Finally, the PM will coordinate with the TechLaw COI Officer so that he can identify and quickly resolve any issues that have the potential for appearance of a conflict of interest.

It is important to note that TechLaw's approach to the designation of a PM is to assign a working manager, someone who is involved with and understands the work, as contrasted to a figurehead manager who is not involved with the work. We believe that a working manager is more cost effective and ensures a better work product.

2.2.1.3 Supervisors

The Quality Control Supervisors, Coding Supervisors, Scanning Supervisors and Project Login-In and Document Control (L&C) Coordinators, are responsible for scheduling work flow, work time tracking, employee relations, production management, vendor relations, and all other tasks that are required to complete projects on time and within budget, and to maintain quality standards of deliverables.

2.2.1.4 Team Leaders

The Team Leaders are responsible for the day-to-day progress of their assigned area of responsibility and for the supervision of those staff assigned to them. They closely monitor the progress and schedule in their respective areas. They will maintain close contact with the client representatives and with each other as needed to successfully address their area of responsibility. They are responsible for assuring that staff is thoroughly familiar with standard operating procedures, the project specific design, and properly trained in their respective tasks. They conduct first-level management review of all work products, and elevate any problems they cannot resolve, including any resource conflicts, to the PM.

They are intimately familiar with the types of work and problems encountered in their area of responsibility and, in addition to having specific experience in managing the type of work required by this project, have an understanding of the issues that are part of the project.

In addition to overseeing the work, they are responsible for production rates and time accounting.

2.2.1.5 Log-In and Document Control Coordinators

The Logging & Control (L&C) Coordinators are responsible to log, control, and maintain records of every document that enters or leaves the facility beginning with the arrival of documents from NMED and ending with return to NMED. The L&C employs a tracking database to accurately manage and report the processing status of every piece of paper received as well as quickly retrieve documents in the facility regardless of their current station in processing. The system is a custom built database based on our years of experience in managing large-scale document intensive automated document projects. This system supports chain-of-custody tracking and can be utilized to respond to NMED requests for documents, if needed.

2.2.1.6 Data Processing Specialists

TechLaw’s Data Processing Specialists manage all facets of image and coded data management including the creation of NMED database deliverables. TechLaw’s Data Processing Specialists expected to contribute to this contract have an average of 9.3 years of automated document support experience. Their resumes are included in the following section.

2.2.1.7 Progress Reports

The project management approach, discussed in the preceding subsections, included progress reports and the responsibilities for preparation of the progress reports. Weekly progress reports are normally made internally between DPC managers, projects mangers, and other TechLaw staff. Monthly progress reports will be made to the NMED Project Manager. The cost of this monthly reporting is included in the costs summarized in Section 1.0 Cost Proposal.

2.2.2 Personnel Summary Table and Resumes

Table 1-2 summarizes information regarding document processing personnel. A list of TechLaw personnel for whom resumes are provided is provided in Table 1-2 including their title, location, years of experience and the page number of the actual resume. Resumes for the TechLaw Account Executive, DPC Managers, Project Managers, Supervisors, Data Processing Specialists, and Legal Support Services are included following Table 1-2.

DOCUMENT PROCESSING CENTERS								
Labor Category	DALLAS, TX		DENVER, CO		CHANTILLY, VA		TOTAL	
	Number	Average Years of Service	Number	Average Years of Service	Number	Average Years of Service	Number	Average Years of Service
DPC Managers*	1	30	1	15	1	21	3	22
Project Managers*	3	22.3	3	10	1	22	7	17
Supervisors*	4	8.5	3	4.7	4	10.2	11	8.1
Coders	29	n/a	22	N/a	33	n/a	84	n/a
Quality Control Staff	15	n/a	8	N/a	17	n/a	40	n/a

Table 1-2 - List of Personnel, Title, Location and Experience

* Resumes provided, and presented by Labor Category in alphabetical order following Table 1-2.

Table 1-2 – List of Personnel, Title, Location and Experience

Project Labor Category	Name	Title	Location	Years of Experience	Resume Page #
Account Executive	Schultz, Suzi	Account Executive	San Francisco, CA	10	10
DPC Managers	Eaton, Brian*	DPC Manager & Data Processing Specialist	Chantilly, VA	21	11
	Nikmanesh, Jay*	DPC Manager & Project Manager	Denver, CO	15	11
	Sweat, Robert*	DPC Manager & Project Manager	Dallas, TX	30	12
Project Managers	Chailer, Monty	Project Manager	Dallas, TX	17	13
	Clark, Kathryn	Project Manager	Dallas, TX	20	13
	Creane, Andrew	Project Manager	Chantilly, VA	22	14
	Nikmanesh, Jay*	DPC Manager & Project Manager	Denver, CO	15	15
	Sigman, Mark	Project Manager	Denver, CO	4	15
	Souther, Brent*	Project Manager & Data Processing Specialist	Denver, CO	11	16
	Sweat, Robert*	DPC Manager & Project Manager	Dallas, TX	30	16
Supervisors	Arbuckle, Claudia	Scanning Supervisor	Dallas, TX	5	18
	Bergamo, Brenda	Quality Control Supervisor	Denver, CO	3	18
	Castillo, Luisia	Project L&C Coordinator	Dallas, TX	5	19
	Epard, Tyrone	Scanning Supervisor	Chantilly, VA	8	19
	Gilbertson, Dion	Coding Supervisor	Denver, CO	10	20
	Hynson, Kay	Quality Control Supervisor	Chantilly, VA	12	20
	Knox, Jeff	Project L&C Coordinator	Chantilly, VA	11	21
	Lake, Roberta	Coding Supervisor	Chantilly, VA	10	21
	Lorrain, Jan	Quality Control Supervisor	Dallas, TX	20	21
	Sullivan, Angela*	Scanning Supervisor & Project L&C Coordinator	Denver, CO	1	21
	Vamvakias, Gregory	Coding Supervisor	Dallas, TX	4	22
	Data Processing Specialists	Eaton, Brian*	DPC Manager & Data Processing Specialist	Chantilly, VA	21
Phillips, Mike		Data Processing Specialist	Dallas, TX	3	23
Souther, Brent*		Project Manager & Data Processing Specialist	Denver, CO	11	24
Legal Support Services	Hopkins, William	Legal Support Services	Chicago, IL	7	25
	Maier, Christina	Legal Support Services	Chantilly, VA	22	26
	Stewart, Jonathan	Legal Support Services	Dallas, TX	17	27
	Swanson, Steve	Legal Support Services	Denver, CO	27	29

* Indicates staff with dual roles.

DPC Managers

BRIAN W. EATON

DPC Manager & Data Processing Specialist (VA)

Years of Relevant Experience 21

Education

B.S., Zoology, 1978, University of Maryland

Synopsis of Experience

Brian Eaton has over 21 years professional experience in the area of litigation support. Mr. Eaton has over 4 years experience in the design, configuration, and implementation of image-based records management systems for the corporate and legal communities. As Vice President of technology for TechLaw Systems, Inc., Mr. Eaton was responsible for establishing and managing TechLaw's image processing center, which is staffed and equipped to process (scan, encode, OCR conversion) 20,000 to 40,000 images per day.

During the last 17 years, Mr. Eaton has been engaged in the development and implementation of complex database management systems. Development of these systems has included database design, custom application software development, system integration, documentation, testing, and training.

During the last 17 years, Mr. Eaton has been engaged in the development and implementation of complex database management systems. Development of these systems has included database design, custom application software development, system integration, documentation, testing, and training.

Mr. Eaton's expertise includes evaluating customer needs as they relate to electronic imaging systems, system analysis, cost analysis, design, document conversion, and implementation. Mr. Eaton is also responsible for the oversight and management of TechLaw's imaging systems hardware and software engineers.

Brief Employment History

1989 - present	Vice President	TechLaw, Inc.
	Director of Imaging Systems Division	TechLaw
1987 - 1989	Deputy Program Manager - TES III	TechLaw, Inc.
1987 - 1989	Director - Computer Support Division	TechLaw, Inc.
1984 - 1987	Work Assignment Manager	TechLaw, Inc.
1983 - 1984	Project Leader	TechLaw, Inc.
1979 - 1983	Scientific Supervisor	Raven Systems & Research, Inc.

JAY NIKMANESH*DPC Manager, Project Manager (CO)**Years of Relevant Experience 15***Education**

B.S., Computer Science, University of Texas, El Paso, Texas, 1984

L.L.B., Law, Tehran University, School of Law, 1977

Synopsis of Experience

Jay Nikmanesh has over 15 years of experience in the design and implementation of software for litigation support and has led intensive computer based projects for private law firms and Federal agencies such as the EPA, DOJ, DOD, and DOI. He has over 10 years of experience managing large, complex litigation support projects. He has over 10 years of experience in providing imaging services to government and commercial clients. He has provided training on all aspects of document imaging from scanning and OCR processing to full-text searching and image retrieval. Mr. Nikmanesh also has provided nationwide customer support on imaging systems and has extensive experience in the demonstration of imaging systems. He is currently Director of Imaging Services for TechLaw's Western Operations. He is responsible for all aspects of imaging for TechLaw's Western Region including marketing, management, and client relations. He is currently the head of the TechLaw-Denver Document Processing Center.

Brief Employment History

1994 - Present	Director, Imaging Services	TechLaw, Inc., Denver Colorado
1988 - 1994	Computer Department Manager	TechLaw, Inc., Denver Colorado
1985 - 1988	Computer Analyst/Programmer	TechLaw, Inc., Denver Colorado

KATHRYN KAYE CLARK*Project Manager (TX)**Years of Relevant Experience 20***Education**

B.A., Business Administration, Dallas Baptist University

Paralegal Certificate

Synopsis of Experience

As DPC and Project Manager with TechLaw's Dallas-DPC, oversees all projects from inception to completion. Serves as the primary client liaison, determines the scope of the project, creates the project specifications and determines the time-lines. Directs all Coding Teams and manages the coding projects for the Dallas Document Processing Center. Works internally with the Technical and Production Managers to ensure project information is communicated, deadlines are met and client satisfaction is achieved. In addition to being a Paralegal, has 20 years of experience in project management to the Dallas team.

Severed as the Director of Group Development for Computer Paradigm Group. Overall responsibilities included operations, project management and software development. Worked with software development teams to devise custom specifications and provided an economic solutions to the client. Analyzed the staff to project required tasks for multi-million dollar projects. Established consistent methods and standard business practices for operations. Pioneered the development of new business units.

As Marketing/Proposal Manager with Aegis Communications the primary responsibilities were two fold, first being creation of marketing materials and second, being the generation of all responses to Request for Information (RFIs), Requests for Quotes (RFQs) and Requests for Proposals (RFPs). Created company biographies for staff, wrote promotional material including case studies of successful vendor partnerships, created a library and cataloged a template of company information in order to expedite the proposal process.

Held the title of Legal Assistant at Nissan Motor Acceptance Corporation. Responsible for tracking all legislation statewide as it pertained to leasing and purchasing of automobiles. Worked with state representatives offices and managing attorney revising contract information. Summarized on weekly/monthly basis the changes in law that would affect written contract language. Devised a filing systems for the legal department and supervised the office staff.

Brief Employment History

2000 - Present	Senior Project Manager	Document Processing Center, TechLaw, Inc.
1999 - 2000	Director of Group Development	Computer Paradigm Group
1996 - 1998	Marketing/Proposal Manager	Aegis Communications
1994 - 1996	Legal Assistant	Nissan Motor Acceptance

Project Managers

MONTY CHAILER

Project Manager (TX)

Years of Relevant Experience 17

Education

BS Business Administration - Oklahoma State University

Synopsis of Experience

Seventeen years of management experience in operations including strategic planning, budgeting, sales and cost controls. Extensive operations and management experience in shipping and receiving, records management, document tracking and control and warehouse management. Experience with SDMS, Lotus, Excel, MS Word, Word Perfect, Access, and Concordance.

As Project Manager with TechLaw's Dallas-DPC, responsible for projects from inception to completion. Serves as a client liaison, determines the scope of the project, creates the project specifications and determines the time-lines. Works internally with the Technical and Production Managers to ensure project information is communicated, deadlines are met and client satisfaction is achieved.

Served as Corporate Facilities Manager for Affiliated Computer Services. Responsible for the overall management and profitability of 210 locations. Coordinated cost reductions and vender consolidation projects. Managed security and maintenance personnel. Negotiated vendor and facility contractor agreements.

Managed operations for a 4 state region for Dataplex Corporation. Responsible for training support, production tracking implementation and profit and loss accountability for 37 service centers. Managed the labor force including hiring, employee reviews and termination.

Brief Employment History

1999 to Present	Project Manager	TechLaw, Inc.
1997-1999	Corporate Facilities Manager	Affiliated Computer Services
1984-1997	Operations Manager	Affiliated Computer Services

ANDREW P. CREANE*Project Manager (VA)**Years of Relevant Experience 22***Education**

1983, J.D., George Mason University

1979, B.S., Business Administration, George Mason University

Synopsis of Experience

Over 13 years of experience in large scale government and commercial litigation support management, including 8 years of project management and over three years of operation management experience. Extensive design and management experience in document indexing, database creation, quality control, imaging, transcript digesting, document screening and tracking, paralegal research, and document and trial center support. Experience with INQUIRE, BRS/Search, Lotus, and Word Perfect software.

Supervised Project Managers and staff supporting document indexing Artel litigation, imaging and document center operations California Gulch (Colorado), Stringfellow site. Directed product and process development, acquisition, and pricing; coordinated utilization of vendors; developed budgets, training, quality control, staffing, equipment and space plans; met with clients and approved new designs and schedules; created and administered project and staff policy and procedure guidelines.

Trained and supervised Project Managers and managed own case load. Designed requirements and procedures for document indexing, including generic edit, pick list, hot key, screen layout, automated de-duplication, level of treatment analysis, and data conversion criteria. Wrote training and user manuals for document indexing Conservation Chemical Corp., document screening, transcript abstracting, data entry, database usage, and exhibit tracking.

Managed multiple and large scale clerical, transcript abstracting, document screening New Bedford Harbor, document indexing Hooker Love Canal and Rocky Mountain Arsenal, and paralegal research projects. Supervised the compilation of exhibits and trial preparation and support efforts on multiple litigations at remote locations.

Managed multiple antitrust cases, including document production, document tracking, screening and indexing projects. Performed paralegal tasks including factual research, drafting pleadings and answers to interrogatories, digesting transcripts, and utilizing on-line database and library resources.

Brief Employment History

1994 - Present	Director of Document Processing	TechLaw, Inc., Chantilly, Virginia
1990 - 1994	Director, Document Processing Operations	Acumenics Research & Technology, Inc.
1987 - 1990	Program Manager	Acumenics Research & Technology, Inc.
1984 - 1987	Project Manager	Acumenics Research & Technology, Inc.
1979 - 1984	Paralegal	Howrey & Simon

PROFESSIONAL OR TECHNICAL REGISTRATIONS

1998 – Present	Quality Assurance Manager, TechLaw, Inc., Dallas, Texas
1995 – 1998	Assistant Coding Manager, IKON, Dallas, Texas
1994 – 1995	Case Clerk, Carrington, Coleman, Sloman & Blumenthal, Dallas, Texas
1990 – 1993	Quality Assurance Analysts, ALS, Dallas, Texas
	Member of Virginia State Bar

MARK J. SIGMAN*Project Manager (CO)**Years of Relevant Experience 4***Education**

B.A., Marketing, Siena College, Loudonville, NY, May 1993

International Business and Foreign Language Certificate (Spanish), Siena College, NY, May 1993

Synopsis of Experience

Mr. Sigman functions as Project Manager for numerous litigation support projects and is responsible for many document processing aspects of the projects including document security, client relations, and project management. Mr. Sigman also has over 4 years of experience in the design and implementation of hardware and software for office environment. He has been involved in troubleshooting, integration, administration, and maintenance of LAN systems. He is experienced in programming in Visual Basic, Microsoft Access, and other web and Widows based applications. He has designed, implemented, and managed databases and has provided training and support to the end users. Mr. Sigman is experienced in designing web pages and in multimedia using Ipix photography and digital video software. He is currently functioning as a Programmer Analyst/Database Specialist for TechLaw's Western Operations.

Brief Employment History

2001 - Present	Programmer Analyst	TechLaw, Inc.
1999 - 2000	Freelance Computer Consultant	
1998 - 1999	MLS Administrator	Teton Board of Realtors

BRENT SOUTHER*Project Manager, Data Processing Specialist (CO)**Years of Relevant Experience 11***Education**B.S., 1987, *Computer Science*, University of Montana, Missoula, Montana.**Synopsis of Experience**

Mr. Brent Souther has over 11 years of experience in the design and implementation of software for information retrieval and has developed computer based applications for federal agencies such as the EPA, DOD, DOI, and DOJ. He has over 8 years of experience in project management for both government and commercial clients. He has over 6 years of supervisory experience. He has provided training and nationwide customer support for database and imaging systems for both government and commercial clients. Mr. Souther also has extensive experience in the design and installation of database and imaging systems in both a standalone and network environment. He currently functions as the Imaging Operations Manager for TechLaw's Western Operations.

Mr. Souther has functioned as Project Manager for numerous litigation support projects, including projects with 500,000 database records. He currently is responsible for all Imaging Operations, including document security, staffing, client relations, and project management for up to 10 concurrent projects. He is accountable for all aspects of a project from inception to final delivery.

Brief Employment History

1996 - Present	Document Processing Manager, TechLaw, Inc.
1994 - 1996	Computer Department Manager, TechLaw, Inc.
1989 - 1994	Programmer/Analyst, TechLaw, Inc.

Supervisors

CLAUDIA Y. ARBUCKLE

Scanning Supervisor (TX)

Years of Relevant Experience 5

Education

High School Diploma – Justin F. Kimbal

Synopsis of Experience

Supervises the imaging area, which consists of inventory, preparation, imaging, verification and reassembly of the documents contained in the client's collection. Maintains a staff consisting of 2 Team Leaders and 20 production staff members. Responsible for ensuring that the documentation goes through each process in a timely manner. Oversees the configuration of the scanners and workflow throughout the various processes. Tracks production quotas as assigned by Production Manager. Trains staff members on imaging specifications and document handling procedures. Records scanning statistics on a daily basis and generates reports. Performs preventative maintenance on the scanning equipment. Identifies discrepancies within the client's collections and notifies the Project Manager. Responsible for maintaining quality control standards for all tasks within the imaging area.

Brief Employment History

1997 - Present	Imaging Manager	TechLaw, Inc.
1993-1996	Bill Processor	First American Real Estate
1992-1993	Customer Service Representative	Emergency Network

BRENDA BERGAMO

Quality Control Supervisor (CO)

Years of Relevant Experience 3

Education

B.S., Computer Science, Metropolitan State College of Denver, In Progress

Synopsis of Experience

Ms. Bergamo has three years of experience in various aspects of document processing for litigation support.

She has assisted in discovery for large class action lawsuit. She has developed excellent computer skills including development and maintenance of large databases. She has assisted paralegal and other litigation support team members in all aspects of the case. She has acquired time and personnel management skills and has led the document coding and QC teams for several projects. She currently functions as the Document Coding Supervisor for TechLaw's Western Operations.

Brief Employment History

1999 - Present	Document Coding Supervisor	TechLaw, Inc., Denver Colorado
1998 - 1999	Document Processing Team Member	TechLaw, Inc., Denver Colorado

LUISIA CASTILLO*Project Log-In & Document Control Coordinator (TX)**Years of Relevant Experience 5***Education**

US High School - GED

Teaching Certification for Elementary Education from University of Emiliano Carranza Superior Normal, Mexico

Synopsis of Experience

Manages entire shipping and receiving department (L&C) for the Dallas Document Processing Center. As L&C Manager, responsible for tracking, securing, and controlling all incoming and outgoing litigation documentation. Accountable for the distribution of workflow to various production areas within the organization. Maintains the integrity of the production database and the generation of reports.

Serving in the capacity as a Quality Inspector, Luisia brings several years experience in reviewing various types of documentation, from blue prints to physical inspection of products. In addition, her experience in education has assisted the Dallas DPC with in the training of documentation in the imaging and L&C areas.

Brief Employment History

1998 - Present	Log-in & Control Coordinator	TechLaw, Inc.
1997 - 1998	Quality Control Inspector	General Cable
1994 - 1997	Quality Assurance Inspector	Phillips Industries
1986 - 1989	Elementary Teacher	Francisco Javier Medina, Mexico

TYRONE EPARD*Scanning Supervisor (VA)**Years of Relevant Experience 8***Education**

1971, Associate Degree, Agriculture, North Carolina State University

Synopsis of Experience

Over eight years of experience in large scale litigation support operations, including three years of scanning management.

Responsible for up to three teams and three team leaders. Manages multiple projects and acts as lead scanning supervisor. Tracks daily project costs and revenues. Coordinates work flow with Coding Group. Provides training to scanners and scan QCers.

Interacts with support vendors. Reviews work quality. Interviews prospective scanners. Drafts proposed "scanner alerts" to provide scanning guidelines for difficult documents. Drafts project specific control and quality control forms. Conducts staff meetings to discuss progress and changes.

Coordinates identification of system or design problems. Collects and analyzes production rates. Collects and analyzes QC forms. Provides quality and production feedback to scanners. Interacts with QA review team. Monitors document backlog and maintains work flow. Recommends handling criteria for problem documents

BRIEF EMPLOYMENT HISTORY

1997 - Present	Scanning Manager	TechLaw, Inc., Chantilly, Virginia
1993 - 1997	Scanning Team Leader	TechLaw, Inc., Chantilly, Virginia
1992 - 1993	Scanner, TechLaw, Inc.	Chantilly, Virginia

DION GILBERTSON*Coding Supervisor (CO)**Years of Relevant Experience 10***Synopsis of Experience**

Mr. Gilbertson has about 10 years of experience in document coding and over two years of experience in various aspects of document processing for litigation support.

He has been involved in document processing activities including document coding, Quality Control, document coding staff training for many litigation projects. He has developed excellent computer skills including development and maintenance of large databases. He has assisted other litigation support team members in all aspects of the case. He has acquired time and personnel management skills and has led the document coding and QC teams for several projects. He currently functions as the Document Coding Supervisor for TechLaw's Western Operations.

Brief Employment History

1999 - Present	Document Coding Supervisor	TechLaw, Inc., Denver Colorado
1991 - 1999	Document Processing Team Member	Various Temporary Personnel Agencies

KAY HYNSON*Quality Control Supervisor (VA)**Years of Relevant Experience 12***Education**

B.A. Psychology and Sociology, East Carolina University, Greenville, North Carolina

A.A. Education, Ferrum College, Ferrum, Virginia

Synopsis of Experience

Responsible for the training and supervision of the scanning staff to ensure the highest level of accuracy and confidentiality in the handling and processing of all documents. Has assisted in coordinating over 100 projects since 1989. Provides supervision in the preparation and scanning of documents. Assists in the final review of all pages for necessary adjustments including OCR change and flagging options. Oversees proper reconstruction of files to their original condition.

Managed three-day international exhibit representing 90,000 net square feet with 10,000+ attendees.

Duties: promotion, exhibit space sales, selection of vendors, exhibitor housing, meeting room assignments, food functions, supervise set-up and tear-down of exhibits and association-related displays. *Exhibitor*

Registration: Processed advanced and on-site registrations, training and supervision of on-site personnel.

International Program: Designed and distributed multilingual brochure, coordinated operation of International Business Center including international reception. Balanced final accounts: Exhibit space income, hotel, exhibit hall and convention center expenses.

Implemented meetings and conferences throughout the year for 20-150 attendees. Responsibilities included: site selection, promotion, attaining speakers, housing preparation of conference materials, meeting room arrangements, A-V requirements, food and beverage, signage, etc. Processed registration in advance and on-site. Balanced final accounts. Prepared budget line items, projected income and expense. Editor of microsoftware newsletter. Marketing and sales of various publications. Attended council and committee meetings as staff representative with responsibility for implementing actions recommended by members.

Brief Employment History

1996 – Present	Quality Assurance Supervisor	TechLaw, Inc., Chantilly, Virginia
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1989 to 1996	Scanning Supervisor	TechLaw, Inc., Chantilly, Virginia
1979 - 1988	International Communications Industries Association	Fairfax, Virginia

JEFFREY KNOX*Project Log-In and Document Control Coordinator (VA)**Years of Relevant Experience 11***Education**

High School Diploma

Synopsis of Experience

Mr. Knox has 11 years supervisory experience. He is responsible for project coordination, customer interaction, and workflow tracking for large document intensive litigation support projects. Mr. Knox is also responsible for scanning and quality control of confidential documents for a variety of clients in a production environment.

Brief Employment History

1991 – Present	Project Coordinator	TechLaw, Inc., Chantilly, Virginia
1978 - 1987	Laboratory Technician	Hazleton Laboratories, Vienna, Virginia
1988 – 1991	Sales	Farrish, Olds, Jeep, Subaru and used Cars, Fairfax, Virginia

ROBERTA J. LAKE*Coding Supervisor (VA)**Years of Relevant Experience 10***Education**

B.S., 1987, Physical Education - Sports Management and Recreation, James Madison University

Synopsis of Experience

Roberta Lake has over 7 years of professional experience in the areas of environmental enforcement support and commercial litigation support. She manages the Coding staff operations for multiple shifts.. Her responsibilities include analyzing and organizing documents, maintaining appropriate staffing levels for all shifts, overseeing the training of all the coding staff, tracking and reporting revenue and production statistics, and quality control and assurance of work products. Ms. Lake manages projects in support of NJ DEP enforcement efforts and for various commercial clients. During her tenure with TechLaw, Ms. Lake has performed general document management, data extraction, data management, and large-scale correspondence tracking activities for major litigation support projects. Ms. Lake has extensive experience working with Federal, private, and confidential/privileged documents.

Brief Employment History

1997 – Present	Coding Manager	TechLaw, Inc., Chantilly, Virginia
1991 - 1997	Project Leader	TechLaw, Inc., Chantilly, Virginia
1987 - 1990	Manager	Downtown Athletic Club, Winchester, Virginia

JAN LORRAIN*Quality Control Supervisor (TX)**Years of Relevant Experience 20***Education**

BFA, Ohio State University

Paralegal Certificate for Litigation Specialist from Southern Methodist University

Synopsis of Experience

Mrs. Lorrain brings 20 Years experience in commercial litigation support. Jan has been involved in all phases of the litigation process including responding to discovery, client interviews, developing databases, coding documents and quality control of the end product and trial preparation. Supervised projects requiring groundwork for trial preparation. Maintain the quality of all data sent to clients.

As Quality Assurance Manager, Jan Assists Project Managers with quality and training issues. Coordinates, tracks the Quality Assurance process and procedures for a variety of litigation support projects i.e. digital image reproduction, complex multi-level coding and imaging. Created and administered training materials for new and existing employees to assure all data is captured according to the client specifications.

Brief Employment History

2001 - Present	Quality Control Manager	TechLaw, Inc.
1986	Paralegal	Thompson & Knight
1991	Paralegal	Attorney General, Consumer Protection
1993	Paralegal	Vial Hamilton Koch and Knox

ANGELA SULLIVAN*Scanning Supervisor, Project Log-In and Document Control Coordinator (CO)**Years of Relevant Experience 1***Education**

B.A., Anthropology, University of Georgia, Athens, GA, May 1999

Synopsis of Experience

Ms. Sullivan has over a year of experience in litigation support document processing and has developed proficiency in electronic imaging, quality control, document coding, data input and updating. In addition to document processing experience, Ms. Sullivan has participated in the development of procedures for processing of various scanning projects including scanning of maps and color graphics. She has participated in the development of numerous production reports such as resource utilization, progress reports, and project scheduling. She currently functions as the document Imaging Supervisor for TechLaw's Western Operations.

Brief Employment History

2000 - Present	Document Imaging Supervisor	TechLaw, Inc., Denver Colorado
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GREGORY VAMVAKIAS*Coding Supervisor (TX)**Years of Relevant Experience 4***Education**

Juris Doctorate, Baylor University School of Law

BA in Business Administration in Finance from the University of Texas

Synopsis of Experience

Responsible for training and supervising the output of documentation staff through the coding process. As Coding Manager he ensures that document determination is performed and coding of the documentation is entered according to the client's specifications. Supervises coding Team Leads, responds to coder alerts, and oversees the quality control team. Greg serves as the primary liaison between coding production and project management.

Serving as a law clerk and through various internships, Greg brings valuable experience such as, research and analysis, as well as drafting, reviewing and revising legal documents. Additional responsibilities included updating and maintaining various databases.

As a Sales representative for Dell Computers, Greg cultivated and maintained national corporate and small business sales accounts. Further he instituted solutions for customer system needs and after-sale support. Assisted in the implementation of a national asset recovery division as well as serving as an advisor for the implementation of client conversion and installation of new computer systems. Participated in research and implementation of national sales strategies for secondary markets.

Brief Employment History

2000 - Present	Coding Manager	TechLaw, Inc.
1998 - 1999	Law Clerk & Intern	Pakis, Giotes, Beard & Page, P.C. State Office of Administrative Hearings, US Attorney's Office
1995 - 1997	Sales Representative	Dell Computers

Data Processing Specialists

BRIAN W. EATON

DPC Manager & Data Processing Specialist (VA)
Years of Relevant Experience 21

Education

B.S., Zoology, 1978, University of Maryland

Synopsis of Experience

Brian Eaton has over 21 years professional experience in the area of litigation support. Mr. Eaton has over 4 years experience in the design, configuration, and implementation of image-based records management systems for the corporate and legal communities. As Vice President of technology for TechLaw Systems, Inc., Mr. Eaton was responsible for establishing and managing TechLaw's image processing center, which is staffed and equipped to process (scan, encode, OCR conversion) 20,000 to 40,000 images per day.

During the last 17 years, Mr. Eaton has been engaged in the development and implementation of complex database management systems. Development of these systems has included database design, custom application software development, system integration, documentation, testing, and training.

During the last 17 years, Mr. Eaton has been engaged in the development and implementation of complex database management systems. Development of these systems has included database design, custom application software development, system integration, documentation, testing, and training.

Mr. Eaton's expertise includes evaluating customer needs as they relate to electronic imaging systems, system analysis, cost analysis, design, document conversion, and implementation. Mr. Eaton is also responsible for the oversight and management of TechLaw's imaging systems hardware and software engineers.

Brief Employment History

1989 - present	Vice President	TechLaw, Inc.
	Director of Imaging Systems Division	TechLaw
1987 - 1989	Deputy Program Manager - TES III	TechLaw, Inc.
1987 - 1989	Director - Computer Support Division	TechLaw, Inc.
1984 - 1987	Work Assignment Manager	TechLaw, Inc.
1983 - 1984	Project Leader	TechLaw, Inc.
1979 - 1983	Scientific Supervisor	Raven Systems & Research, Inc.

MIKE D. PHILLIPS

Data Processing Specialist (TX)
Years of Relevant Experience 3

Education

May 1999	Certified Master C Programmer by TekMetrics, Inc - Certification ID: 1366683950
May 1999	Certified C++ Programmer by TekMetrics, Inc - Certification ID: 578683218
Dec 1998	Bachelor of Science in Computer Science from University of Texas at Dallas with additional courses in Electrical Engineering GPA 3.19

Synopsis of Experience

Supervises the technical processing area, which consists of the management and manipulation of images and data to support 10 scanners and 44 code from image workstations. Develops programs to match processing specifications for timely deliverables to various clients in various formats. Oversees development of database capture models for internal use with validations and pick lists. Oversees technicians for repair and maintenance of equipment and systems.

Brief Employment History

Oct 1999 - Present	Programmer Analyst	TechLaw, Inc.
Jun 1999 – Oct 1999	Tech Support Specialist	Carrington Coleman Sloman & Blumenthal
Jan 1993 – Jun 1999	PC Specialist	Overseas Service Corporation

Programming Languages

C/C++
Pascal
80x86 Assembler

Operating Systems

MS-DOS
MS-Windows
OS/2 (including GUI and multithreading)
UNIX/Solaris (including TCP/IP and multithreading)

BRENT SOUTHER*Project Manager, Data Processing Specialist (CO)**Years of Relevant Experience 11*

Education

B.S., 1987, *Computer Science*, University of Montana, Missoula, Montana.

Synopsis of Experience

Mr. Brent Souther has over 11 years of experience in the design and implementation of software for information retrieval and has developed computer based applications for federal agencies such as the EPA, DOD, DOI, and DOJ. He has over 8 years of experience in project management for both government and commercial clients. He has over 6 years of supervisory experience. He has provided training and nationwide customer support for database and imaging systems for both government and commercial clients. Mr. Souther also has extensive experience in the design and installation of database and imaging systems in both a standalone and network environment. He currently functions as the Imaging Operations Manager for TechLaw's Western Operations.

Mr. Souther has functioned as Project Manager for numerous litigation support projects, including projects with 500,000 database records. He currently is responsible for all Imaging Operations, including document security, staffing, client relations, and project management for up to 10 concurrent projects. He is accountable for all aspects of a project from inception to final delivery.

Brief Employment History

1996 - Present	Document Processing Manager, TechLaw, Inc.
1994 - 1996	Computer Department Manager, TechLaw, Inc.
1989 - 1994	Programmer/Analyst, TechLaw, Inc.

Legal Support Services

WILLIAM HOPKINS*Legal Support Services (IL)**Years of Relevant Experience 7*

Education

Master of Public Affairs (MPA), Environmental and Natural Resource Management
Indiana University, Bloomington 1995
Bachelor of Science (BS), Biology, University of Illinois at Urbana-Champaign 1993

Synopsis of Experience

Mr. Hopkins has demonstrated experience and ability in managing complicated and multi-disciplined environmental projects. Mr. Hopkins currently serves as Project Manager for TechLaw's Enforcement Support Services contract work in EPA Region 5. In this role, Mr. Hopkins coordinates, reviews and oversees a wide range of enforcement and cost recovery projects. These included corporate merger, acquisition, and successorship research; waste-in database calculations; volumetric inventory and cost allocation preparation; comprehensive PRP searches; settlement negotiations; bankruptcy and asset

purchase research; removal and remedial cost analysis; and title analysis on a wide variety of Superfund cleanup projects throughout the country. Mr. Hopkins also has expertise in the disciplines of Federal Facility Oversight, RCRA Oversight, and Community Relations / Public Outreach Support.

Mr. Hopkins has a diversified technical and legal background that includes experience in CERCLA and RCRA related projects, as well as knowledge of various multi-media environmental provisions including NEPA, TSCA, CWA, unexploded ordnance, lead-based paint, radon, and asbestos.

Mr. Hopkins possesses specific training in risk communication and federal cleanup team operations. Mr. Hopkins has expertise in a wide variety of federal, state, local and agency-specific environmental and real estate transfer laws and guidelines. In addition, Mr. Hopkins possesses up to date OSHA Health and Safety Training, including OSHA 40-hour, Annual OSHA 8-hour Refresher, and OSHA Supervisor Training.

PRP / Enforcement Support Services

Serves as Project Manager for multiple Enforcement Support Services Task Orders under U.S. EPA Region 5. This role involves litigation support; corporate merger, acquisition, and successorship research; waste-in database calculations; volumetric inventory and cost allocation preparation; comprehensive PRP searches; settlement negotiations; bankruptcy and asset purchase research; removal and remedial cost analysis; and title analysis on a number of U.S. EPA Superfund Cleanup Projects.

Mr. Hopkins has thorough knowledge of CERCLA related environmental provisions, including a wide range of U.S. EPA enforcement policy and guidance, including general and special Notice, 104(e) information requests, consent decree, lien, settlement, de minimis/de micromis, cost recovery, and bankruptcy.

During tenure as a U.S. Army Contractor, produced multiple Environmental Baseline Surveys (EBSs), facilitating in the transfer of surplus Department of Defense real estate. Tasks included site visits, property assessments, title deed search, historic records search, and compilation of past and current environmental investigations. Developed databases to coordinate environmental documentation for various study areas and operable units on installation.

Produced six Finding of Suitability to Transfer (FOST) and one Finding of Suitability to Lease (FOSL) documents used to clear excess government property. Coordinated transfer of property, drafting legal lease and transfer provisions and environmental protection clauses for title deed.

Federal Facilities Oversight

Serves as Project Manager for the U.S. EPA Remedial Oversight Contract for Wright Patterson Air Force Base in Dayton, Ohio. Mr. Hopkins also conducted a number of field oversight trips and technical document reviews for various Federal Facilities throughout the Midwest, including Fort Sheridan, Savannah Army Depot, Jefferson Proving Ground, and Fort Benjamin Harrison.

As part of this experience, Mr. Hopkins has conducted remedial oversight work including oversight for RI/FS, unexploded ordnance surveys and removals, risk assessments and remedial actions. Mr. Hopkins provided project oversight for \$20 million RCRA landfill capping and shoreline erosion project, ensuring project deliverables consistent with USACE specifications. Managed multiple land and water-based unexploded ordnance (UXO) sampling and removal actions, the majority resulting in recommendations for no use restrictions on property owners. Oversaw successful removal actions involving excavation of soils contaminated with metals, PAHs and solvents. Provided oversight for asbestos and lead based paint surveys and remediation.

Assisted with the production and review of a wide range of CERCLA related documents including sampling and analysis plans, health and safety plans, remedial investigations, feasibility studies, risk assessments, proposed plans, action memorandum and decision documents. Mr. Hopkins was responsible for coordination of wide variety of contractors, ensuring project goals were met in a timely and efficient manner.

RCRA Facilities Oversight

Under RCRA, Mr. Hopkins has field experience in a variety of sampling, interim remedial action, remedial oversight activities, and preliminary assessment / visual site inspections. Mr. Hopkins has also conducted a number of technical document reviews for RCRA Facility Investigations (RFI), Corrective Measures Studies, Remedial Action Completion Reports, and Long-Term Monitoring Reports. Example industries include chemical, steel, manufacturing, solvent recovery, and lead recovery.

Community Relations / Public Outreach Support

Led in the implementation of a comprehensive and successful community relations program at a closing military base. Utilized wide range of communication methods, including fact sheets, newsletters, public notices, press releases, press conferences, media events, public meetings, door to door interviews, and questionnaires. Served as Department of Defense liaison to local government, regulatory agencies, and public regarding environmental issues. Mr. Hopkins has over 40 hours of Department of Defense sponsored training in communicating risk to the general public.

Coordinated over 50 public meetings, including arrangement of speakers, presentation materials, building location and logistics, and handouts. Conducted numerous presentations in public meetings to local government, regulatory agencies, and local community on a wide variety of environmental topics, including ordnance removal actions, shoreline erosion, and property transfer due diligence. Prepared quarterly newsletters and multiple fact sheets on a variety of investigation and cleanup activities. Prepared public notices and press release for CERCLA required activities for distribution to wide variety of broadcast, print, and industry media. Established and maintained CERCLA required administrative record and information repositories. Implemented media events, inviting local media to base for site tours, project briefings, and photo opportunities. Conducted community workshops and poster sessions, incorporating risk communication and specific project information.

Brief Employment History

2000 - Present Senior Staff Consultant TechLaw, Inc.
1995 - 2000 Senior Environmental Consultant Diversified Technology Consulting, North Haven, CT

CHRISTINA A. MAIER, ESQ.***Legal Support Services (VA)******Years of Relevant Experience 22***

Education

J.D., George Washington University, 1980
B.A., Biology, College of Wooster, 1977

Virginia Bar Association, Admitted 1985
Kentucky Bar Association, Admitted 1980

Synopsis of Experience

Christina Maier has 22 years professional experience related to environmental support work. As Director of TechLaw's Research and Analysis Division, Ms. Maier is responsible for ensuring the technical quality of all work products generated by the division. Ms. Maier reviews and analyzes the quality of PRP search reports, interview summaries, and other reports. She is responsible for training division staff to conduct research and keeping staff current on relevant CERCLA issues. She is also responsible for coordinating work flow with Division Project Managers, overseeing the Division's budget, and managing budgets and schedules for projects.

Ms. Maier manages complex Liability Analysis projects involving documenting site operations history and PRP liability, and developing cost allocation formula. Ms. Maier oversees PRP research where hazardous waste determinations are made in accordance with applicable provisions of RCRA, TSCA, and CERCLA,

as amended by SARA. As appropriate to developing a compliance history, Ms. Maier directs research of a party's record of compliance with other Federal, state and local environmental statutes.

Ms. Maier is responsible for overall budget planning and maintenance staffing, and training for the division, which includes 33 multi-disciplined staff. She has also trained personnel in other TechLaw offices to perform PRP Search and Liability Analysis tasks. Ms. Maier has participated in and managed TechLaw's proposal writing efforts for environmental contracts. She also managed research staff who performed legal research concerning intellectual property matters and the automotive industry.

Brief Employment History

1997 – present	Vice President, Research and Analysis	TechLaw, Inc., Chantilly, Virginia
1989 - 1997	Division Director, Research and Analysis	TechLaw, Inc., Chantilly, Virginia
1987 - 1989	Project Manager	TechLaw, Inc., Chantilly, Virginia
1985 - 1987	Project Leader	TechLaw, Inc., Chantilly, Virginia
1982 - 1983	Consultant	Environmental Consulting Services, Inc., Washington, D.C.
1980 - 1982	Staff Attorney	Kentucky Natural Resources and Environmental Protection Cabinet, Frankfort, Kentucky
1978 - 1979	Law Clerk	U.S. Environmental Protection Agency, Washington, D.C.

JONATHAN STEWART

Legal Support Services (TX)

Years of Relevant Experience 17

Education

Master of Science, Environmental Science, Texas Christian University, 1984

Bachelor of Science, Wildlife Management, Arkansas Tech University, 1980

Associate Degree, Wildlife Technology, Abraham Baldwin Agricultural College, 1976

Synopsis of Experience

Mr. Stewart has more than 16 years of project management, environmental, wetland, and ecological assessment experience. Mr. Stewart possesses expertise in operation of full scale remedial investigations, Hazard Ranking System (HRS) evaluations, CERCLA Pre-remedial Site Assessments and ecological risk assessments. Mr. Stewart has also supported Superfund enforcement activities conducting Title and PRP search activities. Additionally, Mr. Stewart has expertise in the areas of Wildlife Biology, Data Management, and Health and Safety.

Mr. Stewart has a diversified technical background that includes the following experience: wetland assessments, wetland delineations, ecological risk assessments, habitat assessments, natural resource assessments, and biotic (flora and fauna) sampling. Additional experience includes a reef ecology study in the Gulf of Mexico. He has assisted in a three year Wildlife Management Study - Habitat restoration and population dynamics for the Eastern Bluebird.

Quality Assurance

Mr. Stewart served as a Corporate QA/QC Program Manager from 1990 to 1998. He evaluated and assessed office compliance with internal programs, conducted peer reviews, laboratory audits, and field audits. Mr. Stewart continues to provide QA/QC support on various projects for TechLaw.

Remedial Investigations

Mr. Stewart served as Project Manager for a three year site assessment on Wheeler Army Airfield in an effort to ascertain the source of trichloroethylene (TCE) which contaminated groundwater used for drinking water in the central Oahu area. Shallow soil borings were installed and sampled at various locations in order to intercept and evaluate the fate and transport of TCE. Mr. Stewart was responsible for establishing an office and managed simultaneous activities on eight different sites such as natural resource assessment,

natural feature inventories, utilities clearance, unexploded ordnance clearing, site grubbing and clearing, soil gas sampling, soil boring installation and sampling.

Ecological Risk Assessment and Wetlands Evaluation

As Task Manager for an ecological risk assessment for the Milan Army Ammunition Plant Remedial Investigation (RI) in Milan, Tennessee, Mr. Stewart conducted and managed activities such as characterizing relevant aspects of the Ammunition Plant ecosystem, and determining if exposure to ordnance related constituents at the site may have adverse effects on ecological receptors. Activities also included determining if ordnance-related chemicals at the site could pose a hazard or substantial threat to threatened and endangered (T&E) species or critical habitat and populations, and determining the spatial and temporal extent of potential ecological effects in selected species that could occur within the study area. Included were avifauna and herpetofauna surveys, terrestrial sampling (flora and fauna), and aquatic sampling (fish and benthic).

Mr. Stewart also conducted ecological risk assessment activities at the Fort Lee Military Reservation, Virginia. Conducted habitat assessments to determine the flora and fauna that accurately represent the various sites under study. Additional activities included: T&E species survey; identifying and mapping major landscape features and the distribution of major habitat types (i.e., grasslands, forests, wetlands, streams); identification of dominant vegetative species and classification of the major vegetation community types; qualitative observations of birds, mammals, fish, stream benthos, and other animals inhabiting the site, or the apparent absence of organisms considered typical of the site habitat type(s). Mr. Stewart conducted extensive Baseline Survey of the Bailey Creek Watershed that originates on Fort Lee and prepared additional scope's of work and work plans for additional ecological assessments at Fort Lee.

Mr. Stewart served as Project Manager of a two-year wetland evaluation project in King Salomon, Alaska. The work was under contract with the USACE, Omaha District. The purpose of the work was to document existing conditions of the wetlands and to assess bioaccumulation of contaminants in fish and other subsistence foods.

Mr. Stewart provided technical assistance to the Irvine, California Ranch Water District Wetlands Water Supply Project and Irvine San Joaquin Freshwater Marsh Enhancement Project. The project entailed the use of reclaimed water as a sustainable water supply for existing migratory waterfowl ponds in the marsh, water quality improvement of creek water leaving the marsh and entering Newport Bay. The purpose of the enhancement project was to provide improvements to water delivery, habitat plantings, and pond/habitat configuration to increase the habitat value of the marsh.

CERCLA Assessments

Mr. Stewart provided project management for 75 Pre-Remedial Site Inspections (SIs) and 20 Hazard Ranking System (HRS) projects. Responsibilities included, managing site access, site reconnaissance inspections, work plan preparation, field sampling, data validation, site inspection report preparation, and HRS Prescore evaluation. HRS management responsibilities included full HRS package preparation for some of the sites and Prescore evaluations for the other sites. Project Management for the site inspection and HRS projects consisted of managing personnel, budget, and quality control of deliverables.

From 1984 through 1990, Mr. Stewart was Chief Environmental Scientist responsible for the transition toward use of the promulgated, revised HRS and provided training to Region VI States and Navajo EPA. Served as HRS Coordinator for EPA Region VI and was responsible for management of HRS projects and reports and maintaining new information and ranking criteria. As a Project Manager, was responsible for CERCLA/SARA preliminary assessments, site inspections, and screening site inspections. Served as the Focal Point/Coordinator for 1988 EPA HRS Pilot Field Study, and was responsible for project management and testing of proposed revisions to the 1982 HRS model. Assisted in revising the Surface Water Pathway to put more emphasis on wetlands and wildlife habitat. Performed FIT hazardous waste site inspections as project manager, site safety coordinator, and member of sampling team. Accompanied respective Region 6 state agencies (i.e., State inspectors, Hazardous and Solid Waste Divisions) on site investigations and sampling inspections.

CERCLA Technical Support

Responsible for managing and providing assistance on a variety of work assignments under the Enforcement Services and Support (ESS) contract. As lead analyst and manager, has prepared several Potentially Responsible Party (PRP) search reports for the EPA. Tasks included reviewing and summarizing federal and state regulatory and enforcement documents; assessing and compiling title records; and writing and editing site reports and attachments.

Project Manager for the Site Discovery Initiative using various databases such as the American Business List and State Lists and comparing those lists with the CERCLA and RCRA Inventory Lists. This was a labor intensive project that required the management of college interns and graduate students doing the work.

Brief Employment History

1998 - Present	Staff Consultant	TechLaw, Inc.
1990 - 1998	Project Manager	Fluor Daniel, Inc.
1984 - 1990	Environmental Scientist	Ecology & Environment, Inc.

STEPHEN SWANSON, ESQ.**Legal Support Services (CO)****Years of Relevant Experience 27****Education**

J.D., University of Denver, College of Law, Denver, Colorado, 1987

B.A., English, University of Oklahoma, College of Science and Arts, Chickasha, Oklahoma, 1973

Synopsis of Experience

Managed and conducted the following litigation support activities:

- Administrative Record Development and Compilation
- Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and Toxic Substances Control Act (TSCA) Notice Responses for federal facilities (U.S. Air Force, DLA)
- Phase II Potentially Responsible Party (PRP) Searches
- Environmental policy research and development
- Regulatory research and analysis
- Cost recovery packages.
- Managed and performed the following tasks:
 - Developed guidelines for the compilation of Administrative Records (ARs) to ensure the ARs were in compliance with federal and state requirements
 - Experienced in AR screening, duplicate searches, document numbering, transmittal searches
 - Extraction/QC of documents, data entry, generation/review of indices, generation/review of progress reports, and other support activities of client's AR program as required
 - Record searches at federal, state, and local regulators' offices, Potentially Responsible Parties document files, and federal facilities
 - Interviews of personnel with knowledge of the generation, handling, storage, transportation, and disposal of hazardous substances, including: federal, state, and local regulators and Potentially Responsible Parties
 - Compilation, generation, audit, and review of databases and protocols
 - Allocation of potential liability
 - Preparation of CERCLA 104(e) and TSCA Notice Response reports.
- Enforced environmental requirements related to design and development of information management systems including: Administrative Records under CERCLA, waste transactions

databases, document inventories, cost summaries and sample evidence profiles. Managed these projects from initial format to final product.

- Managed Air Force program contracts and served as Program Counsel for both Department of Energy (DOE) and Department of Defense (DOD) programs. Duties included: monitoring program and project resources and expenditures, review of program and project progress, consulting for project design and reporting activities, conducting record searches and interviews, and compiling reports and recommendations.
- Participated in Contract Evidence Audit Team (CEAT) work efforts from project initiation through review and final delivery of work product.
- Involved in all aspects of a general practice law firm emphasizing employment and labor law. Involved in initial interview to final disposition of clients' cases, preparation of briefs and pleadings, negotiation and drafting of agreements, and the representation of clients in court and before administrative agencies.

Brief Employment History

1989 - Present	Senior Staff Consultant	TechLaw, Inc., Lakewood, Colorado
1987 - 1989	Associate Attorney and Law Clerk	Beverly N. Ballentine Law Offices, Littleton, Colorado
1974 - 1986	District Rental Manager	Ryder Truck Rental, Kansas City, Missouri and Denver, CO

3.0 TECHNICAL PLAN AND APPROACH

In Section 3.0 we describe TechLaw's general approach to litigation support projects, including image scanning and coding procedures and general project workflow. In Section 2.1.1 we provide a project management overview including a sample schedule, sample weekly status report and sample billing document (invoice). For sake of completeness, in Section 2.2 and 2.3 we have listed the requirements of RFP Section II and III, with a brief "TechLaw Response" indicating how each RFP requirement is met.

TechLaw proposes to scan and code according to specifications made in consultation with NMED. NMED will identify and supply the documents to TechLaw for scanning. Once scanning is complete, coding will take place from image. TechLaw has particular expertise in the delivery and support of many popular formats, as well as tools and services designed to migrate a wide variety of data types for use in many systems. We have particular expertise utilizing Adobe Acrobat, the format specified for this project.

3.1 PROJECT MANAGEMENT OVERVIEW

TechLaw's project team is lead by a Project Manager (PM) for each project (TechLaw's Project Management approach is described in Section 2.2 prior). The PM is responsible for overall project planning and management.

A well-conceived project plan is crucial to meeting project objectives and, more importantly, NMED's automated document support services expectations. Before commencement of a project, the TechLaw PM will discuss with the NMED project contact its document management requirements. This will entail, as needed for each project, a careful review of specific background material and specifications provided by the NMED project contact. The TechLaw PM will work closely with the NMED project contact to coordinate a project planning meeting to review requirements and resolve any questions that may arise. Scanning and coding rules will be established for the project. In addition, specific instructions regarding the deliverable database format and delivery date(s) will be established based on the information acquired in the project planning process and our continued discussions. Following these discussions the TechLaw PM will produce a Draft Document Processing Specification (DPS), which includes the resulting deliverable format and project schedule, and Draft Document Coding Manual (DCM), for NMED approval.

As a project management tool, the TechLaw PM will provide to the NMED, monthly status reports. These reports will track the status of scanning and coding progress on a per page and document (file folder) level. Also, on a monthly bases, the PM will provide to the NMED a billing document.

3.2 WORKFLOW

Because TechLaw specializes in providing complete high volume scanning and database building services, we have developed a variety of procedures to ensure the smooth processing and integrity of our clients' document collections.

3.2.1 Document Tracking

Central to any successful document processing effort is the need for comprehensive document tracking procedures. TechLaw provides tracking services that begin with initial document or CD receipt and follow each unit throughout processing to eventual document return to the NMED. We use an optimum combination of manual and automated procedures. These procedures include an automated Box/Batch Tracking Log to track box receipt, processing and return; Box Control Forms which are attached to each box to identify its contents and location in the process; a coding Batch Processing Log, which describes each image range coding batch and its step in the coding process; and Batch Cover Sheets which describe each coding batch to identify its contents, exceptions and step in the coding process.

Document tracking procedures are designed to allow us to quickly find any page sent to us by NMED, to ensure that all pages are properly processed, and to guard against any possible document loss or misplacement.

Tracking logs are used to record the identity of each person involved in the process, the amount of time required for processing, and the amount of work accomplished. These statistics assist with accountability and with the tracking of work in progress and provide us with the underlying data needed to enable us in meeting our deadlines.

The following subsections assume that TechLaw will scan the original document set.

3.2.2 Document Preparation

The first step in the production process is document preparation for scanning. Document preparation involves removing all staples, paper clips, rubber bands, or other non-permanent bindings from the documents before scanning. Documents will be returned to the client in the same condition in which they were received, including staples, clips, and other attachment devices.

3.2.3 Document Scanning/Imaging and Quality Controls

TechLaw uses a mix of flatbed and high-speed scanners, depending on the quality of the original documents and scans at 300 dpi. Throughput rates on our 300 dpi scanners are highly dependent on the quality and condition of the paper and the amount of document preparation (removal of binding elements) that is necessary. It can range from 200 to 1200 pages per hour. Up to eight flags or hot keys can be used during scanning.

TechLaw maintains three document processing facilities throughout the United States. Our facilities are operational across multiple shifts and, because of our strict adherence to

a common set of tools and procedures, we are able to maximize our flexibility in processing venues while maintaining consistency of output. We write our own production software and are not reliant on third parties to develop features and functionality our clients may require. Our latest generation of production software is based on a TWAIN compliant model, with SCSI scanner interfaces.

The unique and consistent link among our production processes is the image number, which is used to ensure accurate linking between image, batch level data, coded data, and OCR.

TechLaw processes documents in batches. Typically, one box of documents is considered a batch, however, based upon the needs of the client, one box may be subdivided into multiple batches (e.g., Redwells or file folders).

Batches are identified for the scanning operator through the presence of batch header forms within the box. These forms will contain the batch label information designated by the client. These forms can be completed by the NMED, or produced by TechLaw based on rules established with the NMED. As each image is scanned it is visible on the screen for a first pass QC.

3.2.4 Unitization

TechLaw's standard unitization procedure takes place as a separate step, prior to bibliographic coding. A customized application enables viewing of scanned images and creation of logical document ranges based on rule sets approved by the NMED as a part of the approved Document Processing Specification. The resulting linked files are then moved on to the coding phase, enabling accurate image-to-document links and facilitating coding speed. This procedure would apply to images received from another vendor, as well as hard copy images scanned by TechLaw.

3.2.5 Image QC Process

TechLaw offers many different levels of quality control for image processing. The prices in this proposal provide for visual recognition of every image scanned by a scanning operator. Bad images will be rescanned when detected. Our software enables single page replacement and re-scan. Optionally, images may be despeckled and deskewed. At the time of archiving, a decompression program is run to verify that no image has been corrupted by the process.

Additional quality control measures are contained in TechLaw's production software. These include programmatic checks that cross-reference images/documents scanned to images/documents coded or OCR processed (i.e., every image was coded and/or OCR'd, every OCR'd page and/or coded record corresponds to the correct number of images), as well as final link checks after indexing into the database of choice.

Finally, because we code from image, problems often arising from mis-matched images and coded data are eliminated.² TechLaw is responsible for preparing the image link file. This process is included in our fees and is 100% guaranteed to link data to image.

3.2.6 Document Coding

Should any additional coding be required, TechLaw will code from image. TechLaw utilizes quality control checks, programs and procedures, which are more fully described below. All document coding will be performed in TechLaw's domestic Document Processing Centers.

TechLaw's approach to document coding is to emphasize product quality and productivity. These dual goals are met using a customized data entry system, detailed coding manuals, comprehensive training, experienced management and coding staff, and close communication with the NMED. All document coding is performed domestically in the TechLaw DPCs.

Our data entry system is customized for each project. It allows a full range of field edits, hot keys, pull down menus, rollover entries and other features to enhance quality and productivity. These design components are identified during the initial design conference and are thoroughly tested before implementation.

Training is accomplished using an NMED approved Document Coding Manual, which describes each field in depth and illustrates concepts by way of example. Coder training makes extensive use of this manual. Training is supplemented by the use of sample documents and batches that our coders must successfully master before being allowed to code. Coder training is a highly interactive process that utilizes extensive supervisory direction and staff feedback.

Document coders that pass the sample batch-coding test during training are allowed into production coding. Our coders are given constant feedback during the production phase regarding the quality of their work. The first three batches of each coder are QCed by a supervisor who then reviews the coded data with the coder. Project design changes that may be needed (such as the addition of a Document Type) are documented and given to the NMED for approval. Coders are constantly monitored during the production phase. Coders are given QC feedback on each batch through their Team Leader.

Our management and coding staff are selected according to project design requirements. They are experienced in a broad range of coding designs. They have worked with coding approaches using both hardcopy and image applications, and designs requiring both objective and subjective analysis. We maintain a ratio of no more than 15 coders or QCers per Team Leader. In addition, Team Leaders and Project Managers are often fully dedicated to a single project. To the greatest extent possible, coders will be dedicated to this project throughout its life, dependent on a steady flow of documents from the NMED.

² Most vendors code from paper and use manual logs to match images with coded data.

3.2.7 Coding Quality Control

TechLaw's approach to quality control during coding is a continuation of our Quality Assurance Plan that encompasses all phases of the processing operation. It makes use of a well-conceived design and data entry system, a comprehensive coding manual, our experienced management team, our properly trained staff, and open lines of communication with our client.

During production coding, a specialized team is assembled to focus only on the QC review of the coded work product. This QC team is selected from the coding staff based on prior QC experience and current coding quality. The staff is given several tools to review and correct the coded work product. These tools include:

- Training on the proper identification of errors.
- Instruction on how to provide constructive feedback.
- Always performing a 100% original document to coded record review of the coded work product.
- Immediately making any necessary corrections, but rejecting a batch in its entirety for re-coding if needed.
- Using the identical data entry system as the coders, thus avoiding the introduction of any new errors.
- Generating QC Accuracy Reports for each batch.

Records are kept on coder performance to facilitate the review process and to track improvement. To ensure consistency of QCer feedback, the supervisory staff also randomly reviews the quality control staff's work product.

These quality control steps are further augmented by PM review of work in progress, and through postproduction data validation and testing.

Our project management and supervisory staff all have numerous years of experience in litigation support and in managing document coding projects. Our Team Leaders are required to have at least one year of prior work experience as a Quality Control Clerk and a college degree. Our Quality Control Clerks must have previously demonstrated a high level of accuracy and productivity as a Document Coder. Document Coders and Quality Control Clerks must have at least two years of college, have passed a coding test and a management interview, and have demonstrated proficiency on test coding batches prior to work on each project.

3.2.8 Data File Creation

To simplify our processing, TechLaw uses a standard data input format for all its coding. This standard data format allows us to easily adjust to different coding designs, to minimize the keystrokes needed for data entry, and to maximize the edits we can build

into our system. A standard format also allows us to run the data through a multitude of final processing steps such as code conversions, record counts and customized database formats that provide an additional step to ensure data integrity.

3.2.9 Image Processing Network

TechLaw's image processing network handles the remaining steps in the image processing workflow. First, batches of images are archived to optical media, such as CD-ROM, and placed on optical servers. TechLaw uses a 300 dpi resolution as its standard format. Once on the optical servers, the images are available to all workstations on the network. Many of the workstations contain OCR devices, which convert each image in the batch to ASCII text when required by the project. Other workstations on the network are dedicated to creating full-text databases, providing on-line coding services, duplicating optical disk media, or providing high volume image printing services for clients.

3.2.10 Optical Disk Duplication

TechLaw routinely will retain a backup of each optical disk and database file at its facility for customer support and disaster recovery purposes. As the case proceeds, TechLaw can generate subsets of the document collection on CD, according to criteria supplied by the NMED.

3.2.11 Data Shipments to NMED

Database files will be shipped on CD-ROM media in formats compatible with the NMED's selected format. Additional copies of this data can be made for use on additional workstations at other sites and for delivery to other interested parties.