

# J. Matthew Linehan

eDiscovery Attorney



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## Practices/Industries

- eDiscovery
- Complex Business Litigation
- Employment Litigation

## Education

University of Oklahoma  
(B.A., 2005)  
Case Western Reserve  
University School of Law  
(J.D., 2009) (Concentration in  
Litigation, with Honors)

## Overview

Matthew manages all phases of eDiscovery for complex litigation matters from preservation to collection, review, production, and trial presentation. With prior experience in business and employment litigation, Matthew brings a litigator's perspective to eDiscovery, which allows him to quickly identify key issues and develop cost-effective eDiscovery strategies and solutions for clients. His understanding of the nuanced and technical aspects of eDiscovery are valuable both as a preventative measure to avoid potentially costly disputes and as a problem-solving measure if and when disputes do arise.

Matthew is skilled at using Relativity, the industry's leading eDiscovery review platform, to provide clients with intelligent and practical solutions to eDiscovery issues, and is accredited as a Relativity Certified Administrator for his mastery of the software's technical aspects. Matthew uses his high degree of specialized knowledge to provide comprehensive eDiscovery services, and works alongside his clients to learn their businesses and develop practices, procedures, and solutions tailored to each client's needs.

## Experience

### eDiscovery

- Leads eDiscovery strategy in cases of all sizes, from small document productions to cases involving millions of records and terabytes of data.
- Provides counsel on all aspects of eDiscovery to a wide range of clients, including several Fortune 500 companies.
- Uses his training as a Relativity Certified Administrator to maximize the software's flexibility and provide an intuitive interface for end users.
- Strategically collects electronic evidence in a cost-effective way by using analytics tools to identify and understand where clients' data exists.
- Uses analytics tools, such as predictive coding, email threading, near duplicate analysis, categorization, clustering, language identification, pivot tables, data mapping, and data mining, to identify and prioritize the review of key documents.
- Skilled at developing predictive coding algorithms and training predictive coding to find critical documents.
- Responds to and resolves discovery disputes by addressing arguments, planning for contingencies, and providing quick responses.
- Provides counsel with regard to preservation obligations, how to search for and collect data while preserving its integrity, and the drafting of review protocols.
- Coordinates forensic experts and analysis to help clients address eDiscovery matters effectively and efficiently.
- Implements litigation holds, negotiates parameters, and coordinates defensible ESI collections, searches, and productions.

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## Experience (Cont)

### eDiscovery (Cont)

- Supervises document review teams and projects, and assists with depositions by gathering and directing attorneys towards the evidence needed.
- Provides training for eDiscovery best practices and policies for attorneys and businesses with regards to compliance, data mapping projects, litigation hold procedures, electronic searches, document productions, and more.

### Litigation

- Provided employment law compliance training to public and private companies.
- Advocated as first-chair appellate counsel before the Court of Appeals of Ohio, Eighth and Ninth Districts, and before the U.S. Court of Appeals for the Sixth Circuit.
- Advocated as second-chair trial counsel in a disability discrimination case, and obtained a seven-figure verdict for the client.
- Resolved disputes via alternative dispute resolution methods, including negotiation, mediation, and arbitration.
- Coordinated litigation strategy with in-house counsel as well as out-of-state law firms as local or liaison counsel.
- Conducted or supervised pre-suit or on-site investigations, evidence collections, and interviews of key witnesses.

## Presentations

- “Any Sufficiently Advanced Technology... | How to work eDiscovery magic,” Case Western Reserve University School of Law eDiscovery Class Speaker (January 2019)
- “Irth, Wind, and Fired? | How to draft an (in)effective privilege clawback agreement,” Ulmer Presentation (February 2018)
- “Don't Panic! | Making document review manageable with analytics,” Ulmer Presentation (October 2017)
- “Professionalism in the 21st Century: The Ethics of eDiscovery,” A Closer Look: Ethical eDiscovery Concerns Client CLE Seminar (October 2016)

## Involvement

### Professional Affiliations

- Ohio State Bar Association
- Cleveland Metropolitan Bar Association
- The Sedona Conference, Working Group 1

### Honors & Distinctions

- Named to the Ohio Super Lawyers Rising Stars List (2014-2019)
- Accredited Relativity Certified Administrator

### Admissions

- State of Ohio

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## Admissions (Cont)

- U.S. District Court, Northern District of Ohio
- U.S. District Court, Southern District of Ohio
- U.S. Court of Appeals, Sixth Circuit