

[Date]

[Arbitrator Name]

[Arbitrator Address]

[City, State, Zip Code]

RE: [Case Name/Reference Number] - Letter of Instruction Regarding Document Production Guidelines

Dear [Arbitrator Name],

This letter serves as a formal instruction to establish the procedural guidelines for document production in the above-referenced arbitration matter.

The parties request that the following protocols be adopted to ensure an efficient and cost-effective discovery process:

- **Scope of Production:** Production shall be limited to documents that are relevant to the claims and defenses and proportional to the needs of the case.
- **Production Format:** Documents shall be produced in [Single-page TIFF / Multi-page PDF / Native] format, accompanied by standard load files.
- **Privilege Logs:** Any documents withheld on the basis of attorney-client privilege or work-product doctrine must be identified in a privilege log delivered by [Date].
- **Search Methodology:** The parties shall agree upon a set of keywords and a specific list of custodians prior to commencing electronic searches.
- **Timeline:**
 - Requests for Production served by: [Date]
 - Objections and Responses due by: [Date]
 - Substantial completion of production by: [Date]
- **Inadvertent Disclosure:** The parties agree to a "claw-back" provision pursuant to [Applicable Rule/Statute] regarding the accidental production of privileged material.

We request that these guidelines be incorporated into a formal Procedural Order. Please notify the parties if you require a conference to discuss these items further.

Sincerely,

[Your Name]

[Your Law Firm/Company Name]

Counsel for [Claimant/Respondent]

CC: [Opposing Counsel Name]