

For example, documents typed in word processing programs, spreadsheets, databases, graphics files, digital photographs and video, scanned images, electronically stored voicemail messages, instant messages, backup tapes, are all data types that are discoverable in litigation. In fact, a construction project's files will often include many documents in digital form, including job site e-mails, critical path updates, schedule data, bid materials, change orders, job cost reports and estimates, financial statements, payrolls, project correspondence, daily reports, surveys, technical reports, and diaries.