**The Evidence-to-Brief Workflow: A Step-by-Step Guide**

**Comment** This document outlines a systematic, multi-phase process for converting raw digital communications (like emails and OurFamilyWizard messages) into two distinct, court-ready legal documents:

1. **The Consolidated Summary of Facts (The "Encyclopedia"):** An exhaustive, internally-facing document that serves as the master factual record for the legal team. Its purpose is comprehensive understanding and preparation.
2. **The Legal Memorandum (The "Argument"):** A concise, externally-facing document designed to persuade a judge, mediator, or opposing counsel by presenting a clear and powerful legal argument built upon the verified facts from the Summary.

The entire process is governed by a "record-first" principle, meaning every factual claim in the final outputs is directly traceable to a specific, verifiable piece of evidence.

**Syntax Guide:** This guide uses a specific syntax to delineate instructions from context:

* \*\*Comment\*\* / \*\*/Comment\*\*: Explains the strategic purpose and context of a step. This is the "why."
* <<Prompt>> / <</Prompt>>: Contains the explicit, executable instructions for a given phase. This is the "what to do."
* $$Output$$ / $$Output$$: Describes the tangible deliverables produced at the end of a phase. This is the "what you get." **/Comment**

**Phase -1: Discovery (From Seeds to Raw Evidence)**

**Comment** The goal of this initial phase is to cast a wide but targeted net to gather all potentially relevant communications based on initial case themes or "narrative seeds." This is about collection, not analysis. We are creating the raw material that will be processed in later phases. **/Comment**

<<Prompt>> **Inputs:** 3-5 Narrative Seeds (each including Event/Claim, People, Keywords, Date Window, Must-haves, Exclusions).

**Process:**

1. **Initial Search Wave:** For each seed, convert it to precise queries for each platform (Gmail, OFW).
   * **For Gmail:** Use operators like from:, to:, subject:, after:, before:, has:attachment, filename:, and exclusions (e.g., -newsletter).
2. Run all queries. Label all hits as EVID:[Platform]:Staging.
3. **Thread Catch:** For all items in Staging, pull in the full conversation threads and label them as Staging as well.
4. **Lead Mining & Second Wave:**
   * Review all "Staging" items to mine for new leads (names, terms, dates, attachments).
   * Formulate a second wave of search queries based on these new leads.
   * Run the second wave. Label all new hits EVID:[Platform]:Leads.
5. **Triage:** Review every message in Staging and Leads. Assign a triage status: Keep (K), Park (P), or Discard (D). Apply final labels: EVID:K or EVID:P.

**Stop-gate:** The Discovery phase is complete when each seed has at least two "Keep" items OR a documented "No record provided" window, and the last search wave produced no new significant leads. <</Prompt>>

Output

* Labeled and triaged evidence sets (e.g., EVID:K:Gmail, EVID:P:OFW).
* An updated Discovery Worksheet listing all seeds, search queries used, and discovered leads.

**Next Step:** Once you are satisfied with your collection, these folders become the direct input for the next phase.

/Output

**Phase 1: Classifier (From Raw Evidence to a Structured Exhibit Set)**

**Comment** This is the most technically rigorous phase. Its purpose is to transform the unorganized collection of Keep and Park files from Phase -1 into a structured, cataloged, and verifiable set of evidence. This phase creates the foundational database for the entire case. **/Comment**

<<Prompt>> **To begin, confirm you have completed the Discovery phase and have the triaged EVID:K and EVID:P files ready for processing.**

Once confirmed, proceed with the following instructions:

1. **Establish Governing Parameters:**
   * **Timezone:** Normalize all timestamps to America/Los\_Angeles (PST/PDT), formatted as YYYY-MM-DD HH:MM TZ.
   * **Citation Format:** [Exhibit N | Subject | YYYY-MM-DD HH:MM TZ | Msg-ID]
   * **Message ID (Msg-ID):**
     + For Gmail: Use the Message-ID from the email header.
     + For OFW: Use the Message X of YYYY identifier from the report header.
   * **Quote Length:** ≤ 3 lines. Use ellipses for omissions; never change punctuation/case inside quotes.
   * **Tone:** Neutral, past tense. Prefer "the record shows…" or "no record shows…". Avoid evaluative adjectives.
2. **Process Each File:**
   * Extract and preserve all metadata: From, To, Cc, Subject, Date/Time PST/PDT, and Msg-ID.
   * **Apply Redaction Policy:**
     + Retain all headers unredacted.
     + Redact PII of non-parties in message bodies/attachments.
     + Do NOT redact SUD-related passages essential to 42 C.F.R. Part 2 analysis.
   * Assign a unique, stable exhibit name: EXHIBIT\_{NNN}\_{YYYY-MM-DD}\_{short\_slug}.pdf.
   * Compute the SHA-256 hash of the final, redacted exhibit file.
3. **Create the Master Manifest (EXHIBIT\_MANIFEST.csv):**
   * For each exhibit, create a row and populate these exact columns: Exhibit, Msg-ID, Subject, Date/Time PST/PDT, Sender → Recipients, SHA-256, Source Link or Drive Path, Triage (K/P).
4. **Validation:**
   * Flag any message lacking a unique Message-ID.
   * Flag any exhibit missing a Subject or Date/Time.
   * Report any duplicates (same Msg-ID or identical SHA-256). <</Prompt>>

Output

* A complete and final EXHIBIT\_MANIFEST.csv file.
* A full set of individually redacted, uniquely named exhibit PDF files.
* A validation report noting any duplicates or missing metadata.

**Next Step:** Save the master manifest as EXHIBIT\_MANIFEST.csv. This file is the primary input for the next phase.

/Output

**Phase 2: Analysis & Framing (From Exhibits to Insights)**

**Comment** With a clean, structured set of evidence from Phase 1, we now move from cataloging to analysis. The goal is to analyze the record for its strategic strengths and weaknesses *before* writing the narrative. We will identify contradictions and document where the record is silent. **/Comment**

<<Prompt>> **To begin, please provide the EXHIBIT\_MANIFEST.csv completed in the previous step.**

Upon receipt, I will perform the following analysis:

1. **Build a Negative-Evidence Log:** For each material request, note “no reply within 72h” (or other specified window), bounded by the nearest inbound/outbound emails with full citations.
2. **Build a Contradictions Matrix:** Identify obvious mismatches across dates/claims. Each row must include citations for both sides of the contradiction.
3. **Confirm Minimal Pack:** For each original seed, confirm there are 2–4 Keep-labeled exhibits, relevant policy pages, or a documented silence window. <</Prompt>>

Output

* A Negative-Evidence\_Log.csv.
* A Contradictions\_Matrix.csv.
* A "Ready" checklist confirming each seed is sufficiently supported.

**Next Step:** Save these two CSV files. You will synthesize these with the manifest and exhibits in the final phase.

/Output

**Phase 3: Synthesis (From Insights to Final Deliverables)**

**Comment** This is the final production phase where all prior work is synthesized into the two core deliverables. We will first build the comprehensive "Encyclopedia" for our internal team, and from that, we will extract and frame the persuasive "Argument" for the external audience. **/Comment**

**Part A: The Consolidated Summary of Facts** <<Prompt>> **To begin, please provide the EXHIBIT\_MANIFEST.csv, Negative-Evidence\_Log.csv, and Contradictions\_Matrix.csv. Also, confirm you have access to the folder of individual exhibit files.**

Upon receipt, I will synthesize all materials into a single, comprehensive narrative document with the following strict order and content:

1. **Findings of Fact (8-15 numbered items):** Each finding is a single, concise sentence that ends with a full bracketed citation.
2. **Timeline (PST/PDT):** A bulleted or tabled list. Each entry must show: Date/Time, Subject, Sender→Recipients, a key 1-2 line quote, and its citation.
3. **Evidence Tables (Claim → Quote → Exhibit):** For each disputed point, use a table to show the claim, the direct quote(s) proving it, and the full citation.
4. **Conclusions of Law / Policy:** Apply relevant plans, standards, and laws (e.g., 42 C.F.R. Part 2) to the numbered findings. No new facts may be introduced here.
5. **Exhibits List:** A verbatim list of all exhibit filenames, mirroring the manifest exactly. <</Prompt>>

Output

* The complete **Consolidated Summary of Facts.docx**. This is the internal, encyclopedic master file.

**Next Step:** Save the final document as Consolidated Summary of Facts.docx. This is a critical deliverable and the sole source for the next step.

/Output

**Part B: The Legal Memorandum & Final Package** <<Prompt>> **You have just created the Consolidated Summary of Facts.docx. This is the complete factual foundation.**

**The final step is to produce the complete deliverable package. Please provide the Consolidated Summary of Facts.docx to begin.**

Upon receipt, I will use it as the single source of truth to produce the following mandatory outputs (A-F):

A. **One-Page Findings of Fact:** The 8-15 numbered items from the Summary. B. **Executive Summary (approx. 3 pages):** A neutral synopsis of the dispute, salient records, and legal/policy frame, with all claims cited. C. **The Full Brief:** The Consolidated Summary of Facts document itself. D. **Contradictions Matrix:** A finalized table with columns: "Claim / Representation" vs. "Contradictory or qualifying record," with cites on both sides. Use the markdown template below. E. **Negative-Evidence Log:** A finalized table listing material requests and noting "no reply within 72h," bounded by adjacent communications with cites. Use the markdown template below. F. **42 C.F.R. Part 2 Elements Checklist:** A table with rows for each element, a Yes/No conclusion, and a citation. Use the markdown template below.

**TABLE TEMPLATES:**

* **Contradictions Matrix:** | Claim / Representation | Contradictory or Qualifying Record | | --- | --- | | "<claim>" [Exhibit N | …] | "<quote>" [Exhibit N | …] |
* **Negative-Evidence Log:** | Request (Subject, Sender→Recipients) | Sent (PST/PDT) | Silence Window | Next Inbound / Bounding Email | Note | | --- | --- | --- | --- | --- | | <subject> [Exhibit N | …] | 2025-07-12 10:12 PDT | 72h | <next inbound summary + cite> | No reply in window |
* **42 C.F.R. Part 2 Elements:** | Required Element | Met? | Citation | | --- | --- | --- | | Identifiable SUD info disclosed | Yes/No | [Exhibit …] | | §2.31 consent present | Yes/No | [Exhibit …] | <</Prompt>>

Output

* A complete package containing documents A-F, ready for review. This includes the final **Legal Memorandum.docx**, which is a polished version of the Executive Summary and Findings.

**Next Step:** Perform a final Quality Control check using the checklist below. The process is now complete.

**QUALITY CONTROL CHECKLIST:**

* [ ] All times normalized to PST/PDT with absolute dates.
* [ ] Every material sentence ends with a bracketed cite in the exact format.
* [ ] All quotes ≤ 3 lines; ellipses used where excerpted.
* [ ] Findings and Timeline contain Msg-IDs on first reference to each message.
* [ ] Manifest created with SHA-256 for each exhibit file.
* [ ] No evaluative adjectives or speculation.
* [ ] Part 2 checklist completed with Yes/No + cites.
* [ ] Exhibits List exactly matches manifest titles.

/Output