II.

Complaint Counsel's motion to compel production of documents seeks an order

Electronic records are no less subject to disclosure than paper records. *Rowe Entm't v. The William Morris Agency, Inc.*, 205 F.R.D. 421, 428 (S.D.N.Y. 2002). In contrast to traditional paper discovery, the discovery of electronic data may be vastly more expensive depending on how the electronic data is stored. *Wiginton v. CB Richard Ellis, Inc.*, 2004 U.S. Dist. LEXIS 15722, *11 (N.D. Ill. 2004); *Zubulake v. UBS Warburg, LLC*, 217 F.R.D. 309, 316 (S.D.N.Y. 2003). In particular, [redacted]

[redacted]