

E-DISCOVERY

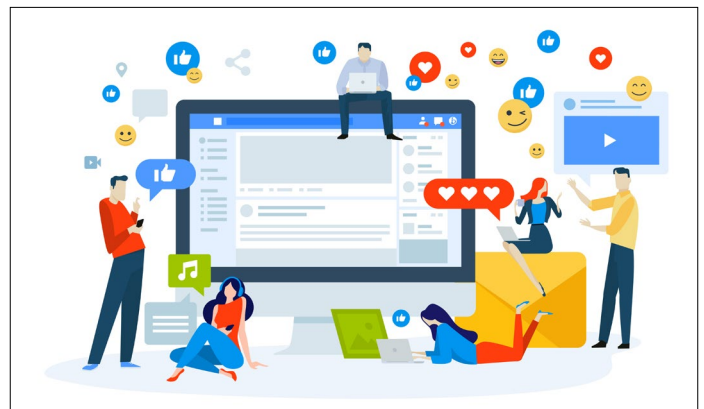
Federal Court Provides Guidance on
Discovery of Teams Messages

By Daniel J. Toal, Geoffrey R. Chepiga and Ross M. Gotler
October 9, 2026

A chat conversation is not a document with definitive edges, but a stream of short messages that may be stored as individual communications rather than as an integrated conversation thread. These characteristics can require parties to make particularized decisions about how chat messages should be identified, searched, reviewed, and produced.

As a result, discovery methods designed and calibrated for emails and electronic files may operate differently when applied to chat data. Search terms may identify individual messages without the surrounding exchanges needed to understand them; the appropriate form of production may not be obvious; and the scope of the relevant conversation may be difficult to define. But producing additional context can expose unrelated communications, raising questions about whether and how relevance redactions may be used.

A recent decision from the Northern District of Indiana illustrates how these issues can



Credit: PureSolution/Abode Stock

arise in practice and how a federal court has addressed them. In *Valcrum, LLC v. Dexter Axle Co., LLC*, 2026 WL 2069810 (N.D. Ind. July 15, 2026), the court addressed the production format for Microsoft Teams (Teams) messages, the use of search terms to identify responsive messages, the contextual information needed to understand those messages, and redactions to a chat production.

In this instance, the court largely accepted the producing party's explanation of how its Teams data was stored, but required additional messages surrounding the search-term hits and ordered previously produced threads reproduced without redactions.

‘Valcrum’

In *Valcrum*, the plaintiff alleged that the defendant copied its hubcap product after the plaintiff ended the parties’ supply arrangement. During discovery, the parties repeatedly disagreed about the production of Teams communications exchanged among the defendant’s employees. As part of its responses to the plaintiff’s initial set of production requests, the defendant produced only individual Teams messages that hit on search terms.

The plaintiff later served additional requests for production seeking Teams messages. The defendant “produced additional Teams chats in a new format that” grouped previously produced individual messages into chronologically organized conversational threads, with certain content redacted.

Believing that this production contained new Teams messages, the plaintiff then served another set of production requests seeking “the entirety of the Teams conversations that were previously produced” and unredacted versions of the threaded conversations from the most recent production. The defendant objected to those requests.

Motion to Compel

The plaintiff moved to compel, demanding, among other relief, production of “the entirety of Teams messages for this litigation and to organize those Teams conversations into threads that provide the missing context from when the messages were produced as stored in the ordinary course of business.”

It argued that the earlier production of individual messages without sufficient conversational

context had prejudiced depositions and that the threaded conversations were too heavily redacted to be understood. It also insisted that the defendant had employed a “fundamentally flawed search methodology” that omitted relevant messages falling within the defendant’s own search criteria.

The defendant maintained that its search process was appropriate and that it had produced responsive messages as they were maintained in the ordinary course of business. It characterized the chronological thread renderings as a courtesy, not a correction to a deficient production. See *id.*

Form of Production

In its analysis, the court first addressed the form of production, specifically the plaintiff’s demand that the defendant produce full Teams threads. Under Federal Rule of Civil Procedure 34(b)(2)(E)(i), documents must be produced as kept in the usual course of business or organized by request category, while under subsection (ii), when no form is specified, ESI is required to be produced as ordinarily maintained or in a reasonably usable form.

While noting that courts disagree whether subsection (i) applies to ESI at all, the court nonetheless examined whether the defendant successfully demonstrated that it produced the Teams messages as kept in the ordinary course of business. The court found that the defendant “satisfied its burden by describing the way Microsoft stores individual Teams messages with the inbox belonging to each specific custodian engaging in a Teams conversation, instead of storing them in separate threads.”

Relying on authority discussing Principle 6 of The Sedona Conference Principles, under which a responding party is generally best positioned to preserve, search, and produce its own ESI absent a demonstrated deficiency, the court concluded that requiring the defendant to construct and produce complete Teams threads was not appropriate.

Search Methodology

The court next addressed the plaintiff's challenge to the defendant's search process, which the plaintiff claimed had resulted in the omission of relevant messages. The defendant argued that its search methodology was appropriate and that the Teams messages already produced were sufficient.

While not opining on the search methodology itself, the court determined that by producing only messages that matched its search terms, the defendant "fail[ed] to recognize that the nature of Teams conversations renders its rigid adherence to producing only those messages that are responsive to its search terms impractical."

It also quoted another court's observation that "[k]eyword searches alone, without more advanced and thoughtful search techniques, will be inadequate for Teams data—a medium where conversations are shorter, more informal, and less likely to include full names than email."

Context and Redactions

Having determined that producing only messages responsive to the defendant's search terms did not provide sufficient context, the court then considered what additional context

was needed with regard to the production of Teams messages. The plaintiff sought full sets of Teams correspondence, but the court found that proposed remedy "too broad."

The court therefore sought to balance the plaintiff's need for context against concerns about relevance and burden by adopting a narrower remedy that "provides the context that Plaintiff seeks while maintaining the bounds of relevant discovery."

Drawing on guidance from another district court decision, the court directed the defendant to produce messages from the same conversation for the three days before and after each identified message. See *id.* The court concluded that this limited production would provide the necessary context without extending beyond relevant material or imposing an undue burden on the defendant.

Separately, the defendant defended its redactions to the Teams threads by asserting that the requests were "overly broad, unduly burdensome, vague, ambiguous, and seeking information not proportional to the needs of this case." The court observed that the defendant did not elaborate on these boilerplate objections and deemed them waived, characterizing them as the "reflexive invocation of the same baseless, often abused litany" of discovery objections and ordered the defendant to re-produce the Teams threads without redactions.

Practical Lessons

Valcrum provides a number of valuable takeaways for discovery in federal court cases. First, a deep understanding by counsel of the client's data can be critical. Here, the defendant

and its counsel explained to the court that Microsoft stores Teams messages individually rather than as integrated conversation threads.

The court accepted that explanation and rejected the plaintiff's demand that defendant be compelled to reconstruct and produce complete Teams threads to meet its obligations under the Federal Rules. That result reinforced the importance of Sedona Principle 6, long embraced by courts, that absent a demonstrated deficiency, the responding party is generally best positioned to determine how to preserve, search, and produce its own ESI.

Second, search and production methods should account for the conversational nature of chat data. A Teams message may be stored as an individual communication, but its meaning may depend on nearby messages that do not themselves

contain a search term. Thus, although the court did not find that the defendant's search methodology was deficient, it concluded that producing only messages containing search-term hits did not provide sufficient context. Parties therefore should not assume that methods developed for email or electronic files will work equally well for short, informal chat exchanges.

Third, parties should develop a reasonable, defensible method of providing context around responsive chat messages before a dispute arises. The court's solution, requiring produc-

tion of messages from the same chat for three days before and after each identified message, appears broader than necessary and may sweep in substantial unrelated material, particularly in active chats.

A contextual boundary based on time, conversational sequence, participants, or another measure suited to the platform and matter may be more appropriate. By contrast, producing isolated hits without meaningful context risks inviting a court to impose a broader rule, as happened here.

Fourth, parties should be prepared to address relevance redactions for chat and similar ESI. When contextual production of such ESI would disclose unrelated, personal, or otherwise irrelevant communications, tailored redactions may be reasonable.

Parties should consider addressing that issue expressly in their ESI protocols or other discovery agreements. If redactions are challenged, however, the producing party should support them with specific, fact-based reasoning; boilerplate objections may be deemed waived, as they were in *Valcrum*.

Daniel J. Toal and **Geoffrey R. Chepiga** are litigation partners and **Ross M. Gotler** is deputy chair and counsel, e-discovery at Paul, Weiss, Rifkind, Wharton & Garrison. **Lidia M. Kekis**, e-discovery attorney, assisted in the preparation of this article.