



# Paul Connolly

Managing Director

San Francisco, CA

## Contact

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## Skills & Qualifications

- 20+ years in digital forensics, cybercrime, eDiscovery, and litigation.
- Expert witness in courts, arbitrations, and regulatory matters.
- Led investigations on trade secrets, IP disputes, and metadata issues.
- Conducted forensic analysis of cyber breaches and wire fraud.
- Managed large-scale document reviews and discovery negotiations.
- Directed internal investigations across corporate and legal sectors.
- Experienced in M&A, private placements, and strategic legal deals.
- Built and led discovery operations in Asia with cross-border expertise.
- Published on AI, cybersecurity, and financial crime prevention.
- Advised on SEC compliance and data retention in high-stakes cases.

Paul Connolly is a Managing Director in the Cyber Data & Resilience practice of Kroll. Paul is the co-chair of Technical Expert Services and manages expert witness matters in the Americas.

Paul serves as an expert witness and consulting expert in federal and state courts as well as arbitration, in matters involving information technology, intellectual property, digital forensics, electronic discovery and other complex disputes which arise from the flow of information and the usage of digital data, computers, software, networks and the Internet. Paul has over 20 years' experience in investigations and electronic data. As a fraud and digital forensic investigator and eDiscovery expert, Paul provides project management on a full suite of end-to-end digital forensic services including data analytics, ESI consulting, and expert testimony for internal investigations, trade secret theft, software, and cyber-crime cases worldwide.

## Representative engagements

- Provided expert testimony and digital forensic services for a construction company involved in litigation, analyzing digital evidence and presenting findings in court to support the client's position.
- Delivered expert testimony and conducted comprehensive digital forensic analysis for a special effects company pursuing legal action against a competitor, focusing on the unauthorized exfiltration of proprietary data by a former employee.
- Performed eDiscovery and forensic data collection for a construction company, supporting legal teams in gathering, preserving, and analyzing electronically stored information relevant to the case.
- Offered expert testimony and led data remediation efforts for a medical device and software company, ensuring compliance with legal mandates and assisting in the resolution of data-related disputes.
- Conducted an internal investigation for a pharmaceutical company regarding allegations of trade secret theft, involving forensic analysis of digital systems and employee activity to determine the scope and impact of the breach.
- Executed eDiscovery and forensic data collection for a sports management company, enabling legal counsel to review and assess relevant digital communications and documents.

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- Supported a bankruptcy debtors committee with eDiscovery and forensic collection services, facilitating the identification and preservation of critical financial and operational data during proceedings.
  - Acted as a consulting expert and performed forensic analysis for Tata Consultancy Services, Ltd., contributing to the defense in a trade secrets case by evaluating digital evidence and metadata.
  - Conducted forensic analysis for a professional recruiting firm, investigating internal data handling practices and potential breaches of confidentiality or compliance.
  - Served as a consulting expert for a major agricultural company, leading a spoliation investigation and managing eDiscovery processes to assess data loss and ensure legal defensibility.
  - Led an internal investigation for a major news network (confidential matter), focusing on digital evidence collection and analysis to support internal compliance and risk mitigation efforts.
  - Reviewed software code for a major cloud services provider as part of M&A due diligence, assessing intellectual property integrity and identifying potential risks in the transaction.
  - Applied data analytics for an airline food services company in connection with wage and hour litigation, analyzing employee timekeeping and payroll data to support legal arguments.
  - Conducted an internal investigation for a major shipping company, examining digital records and communications to uncover potential misconduct or regulatory violations.
  - Delivered eDiscovery and forensic collection services for a brand merchandising company, enabling legal teams to access and review relevant digital content for litigation.
  - Led internal investigations for an institutional bank, focusing on regulatory compliance, document retention practices, and digital evidence analysis in response to legal inquiries.
  - Provided eDiscovery and forensic collection services for a seafood distributor, supporting legal teams in gathering and analyzing digital records related to business operations.
  - Supported a real estate management firm with eDiscovery services, helping legal counsel manage and review digital documents for litigation and compliance purposes.
  - Conducted an internal investigation, eDiscovery, and incident response for a major computer manufacturer (confidential matter), addressing potential data breaches and ensuring proper handling of sensitive information.

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- Performed IT due diligence for a private equity firm in connection with financial transactions, evaluating technology infrastructure and digital assets for risk and compliance.
  - Applied data analytics for a pharmaceutical laboratory in wage and hour litigation support, analyzing employee data to identify discrepancies and support legal claims.
  - Delivered internal investigation, forensic collection, and eDiscovery services for a national real estate brokerage firm, assisting in the resolution of legal disputes and compliance reviews.
  - Provided eDiscovery services for a United States agency, supporting legal and regulatory matters through the collection and analysis of digital evidence.
  - Acted as a consulting expert, performed forensic analysis, and supported eDiscovery for a payroll services firm, addressing data integrity and compliance issues.
  - Served as a consulting expert in a data breach matter for a social media company (confidential engagement), analyzing the breach and advising on remediation and legal strategy.
  - Provided consulting expertise for a pharmaceutical company in connection with internal and external investigations, focusing on digital evidence and compliance.
  - Delivered eDiscovery and forensic analysis services for an artificial intelligence software company, supporting legal teams in reviewing proprietary algorithms and data handling practices.
  - Acted as a consulting expert in a data breach investigation for a United States agency, evaluating the breach and advising on legal and technical responses.
  - Supported eDiscovery efforts for a pharmaceutical company involved in litigation, managing digital document review and production.
  - Served as a consulting expert for Travelers Casualty and Surety Co. in a legal dispute, analyzing digital records and providing expert opinions on data handling and compliance.
  - Provided eDiscovery services for an agricultural equipment manufacturer, assisting in litigation through digital evidence collection and review.
  - Delivered eDiscovery support for a California-based health care company involved in litigation, ensuring proper handling and analysis of patient and operational data.
  - Conducted eDiscovery for an electric car manufacturer in connection with legal and compliance matters, focusing on digital communications and technical documentation.

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- Performed due diligence code review for a supply chain management company during an M&A transaction, assessing software assets and intellectual property risks.
  - Conducted intellectual property due diligence for an institutional trading platform as part of an M&A transaction, evaluating proprietary technologies and data systems.

## Employment History

**Kroll Cyber**, May 2016 – Present

*Managing Director, March 1, 2025-Present*

*Associate Managing Director, March 1, 2018-Present*

Paul Connolly manages complex investigations and disputes in a wide variety of industries and geographies on behalf of litigants, corporations and government agencies. Paul also serves as an expert witness and consulting expert in Federal and State courts as well as arbitration, in matters involving information technology, intellectual property, digital forensics, electronic discovery and other complex disputes which arise from the flow of information and the usage of digital data, computers, software, networks and the Internet.

Paul has over 20 years' experience in investigations and electronic data. As a computer forensic investigator and eDiscovery expert, Paul provides project management on a full suite of end-to-end digital forensic services including data analytics, ESI consulting, and expert testimony for internal investigations, trade secret theft, software, and cyber-crime cases worldwide.

**Cleary Gottlieb Steen & Hamilton LLP**, New York & Hong Kong

*Staff Attorney, August 2013 – March 2014*

*Law Clerk/Registered Foreign Lawyer (Hong Kong), June 2012 – September 2013*

*Staff Attorney, August 2008 – April 2012*

- Trained and directed teams of attorneys in internal investigations involving “front page” regulatory enforcement matters in New York, Hong Kong, and Tokyo.
- Advisor to partners, associates and staff regarding litigation technology matters. Developed methods to streamline discovery/fact investigation regarding compliance with subpoenas and document requests to assist case teams.
- Leading role in investigations by U.S. and foreign regulators of alleged manipulation of foreign exchange trading by traders at institutional banking client and other major banks.
- Directed numerous document reviews for internal investigation and multiple global regulatory actions regarding institutional client's alleged manipulation of LIBOR and other international benchmark interest rates.
- Started firm's successful Asian "discovery practice" and led document reviews for Asian manufacturing clients involved in federal antitrust investigations and litigation. Developed vendor relationships in Hong Kong and Tokyo and negotiated with, selected and engaged technology specialists. Extensive experience negotiating with US vendors to harness latest software and system requirements for document collection, review and production.
- Member of firm's Litigation Technology Committee.
- Negotiated with government attorneys regarding discovery parameters and search terms.
- Primary responsibility for and oversight of multi-million page document productions to federal, state and foreign regulators.
- Managed team of 50+ attorneys in fact research and analysis, responsiveness review, and privilege review of documents in connection with multiple simultaneous regulatory investigations and litigation related to Madoff Ponzi scheme over a period of three years.
- Co-managed team of 125 attorneys in 12-month electronic document review for institutional client in connection with SEC and NYAG investigations related to client conduct surrounding subprime mortgage losses.
- Prepared interview memos, key documents collections and advocacy presentation decks.

**Bonjour Thorman Baray & Billingsley, Hayward, CA**

Attorney, June 2007 – November 2007

- Counsel to white-collar criminal defendant in Northern District of California in 2007 (during relocation of spouse to San Francisco), including advising lead attorney on extensive review of banking records.
- Worked extensively with client in federal custody and interacted with FBI and US Attorneys.

**Cypress Legal Recruiting, New York, NY**

Managing Director, December 2006 – April 2007

- Associate placements at US and UK firms in Asia Pacific Region. Developed Asia Guide, a reference guide to law firms in the region, and general advice regarding relocation to Asia. Responsible for China and Japan.

**Fasciana and Associates, PC, New York, NY**

Associate, September 2001 – November 2006

- Corporate counsel to clients in media, financial services, technology, industrial, entertainment and sports industries.
- Full case or senior level responsibilities in numerous mergers and acquisitions, private placements, and strategic alliances.
- Negotiated cross-border, joint venture, and pre-merger technology sharing agreements. Counseled numerous clients in connection with requirements of SEC Regulation D and Rule 144 in connection with private placements.

## Selection of Noteworthy Cases

### Trade Secrets Case

**On Behalf of:** Akin Gump

Currently conducting a forensic investigation on behalf of an investment advisory firm following the departure of a key trader alleged to have destroyed critical company source code in an in-house repo.

### Systems Compromise Case

**On Behalf of:** Schwartz Sladkus Reich Greenberg Atlas

Testified at deposition on February 10, 2025 as client's named expert in connection regarding an allegedly compromised M365 tenant following an attacker-in-the-middle attack that cause a multi-million-dollar misdirected wire intended for a large German bank in connection with a real estate transaction. The matter settled shortly after the deposition on terms very favorable to the client.

### Network Compromise Case

**On Behalf of:** Mullen Coughlin

Consulting expert with possible testimony, in a bellwether class action related to the MOVEit zero-day attack. Based on extensive review of policies and procedures, Paul and team are providing input regarding reasonableness of client and vendor cyber security measures as of the time of the attack.

### Systems Compromise Case

**On Behalf of:** Coan, Payton & Payne

Paul was named a testifying expert in a systems compromise case resulting in a significant loss from a wire fraud perpetrated by the threat actor. Paul attended trial in April 2025 and will be the next witness to testify when proceedings resume in September 2025.

### Breach of Contract Case

**On Behalf of:** Sidley Austin

Paul is currently serving as an expert witness regarding document forensics and the customary use of redlines in a breach of contract matter in which data and document attributes are at issue. Paul testified at deposition on September 12, 2024 in Los Angeles, CA and is expected to testify at trial in federal court in August 2025.

### Trade Secrets Case

**On behalf of:** Skadden; Quinn Emmanuel

Paul served as a testifying forensic expert witness on behalf of a biotechnology company in connection with an action brought against it by a competitor. Kroll is conducting an investigation including extensive forensic analysis and document review. Should the matter proceed, Paul is expected to testify at deposition and trial in federal court.

### **Trade Secrets Case**

**On behalf of:** Brown Neri Smith & Kahn LLP

Paul served as a testifying forensic expert witness at trial in federal court on behalf of a biotechnology company specializing in gene therapy in an action against a competitor after a departing employee allegedly exfiltrated confidential documents and joined the competitor. Kroll conducted an investigation including extensive forensic analysis and document review. Paul was deposed in Fall 2023 and testified at trial in October 2023. Client prevailed in litigation.

### **Trade Secrets Case**

**On behalf of:** Duane Morris LLP;

Paul was named as a testifying forensic expert witness on behalf of an electrical contractor in an action brought action against it by a competitor alleging that certain departing employees exfiltrated trade secrets and confidential documents. Kroll is conducting an investigation including extensive document review and forensically captured metadata. Paul is expected to testify at deposition and trial, barring settlement.

### **Digital Forensics Case**

**On behalf of:** Chancery Legal Ltd.

Paul was named as Testifying Expert in a matter involving metadata associated with an email allegedly sent by a party in a commercial trade dispute based in Bermuda. Paul and team analyzed relevant documents, prepared an expert report, and responded to claims by the opposing expert. Paul is expected to testify at trial before the Supreme Court of Bermuda in early 2025.

### **Theft of Trade Secrets Case**

On Behalf of: Fisher Philips LLP

Lead investigator in trade secret misappropriation case on behalf of defendant. Testified at deposition and the case settled on the eve of trial. Led investigative team in certifying client's compliance with a preliminary injunction order for data remediation. Identified material potentially belonging to Defendant for deletion pursuant to the order. Advised and assisted Client with compliance with the settlement agreement in designing and monitoring another diligent search for Plaintiff's documents.

### **Trade Secrets Case**

On Behalf of: Schook Hardy & Bacon LLP

Provided forensic expert witness testimony at deposition on behalf of a special effects company which brought an action against a competitor after a departing employee allegedly exfiltrated confidential documents and joined the competitor. Kroll conducted an investigation including extensive forensic analysis and document review. The matter settled, on terms favorable to the client, on the eve of trial.

### **Landmark Trade Secret Theft Investigation**

***Waymo (Google) v. Uber***

On behalf of: Goodwin Proctor and Boies Schiller

Paul served as a consulting expert on a team led by Kroll testifying expert Erik Laykin, on behalf of Ottomotto LLC and Otto Trucking LLC, along with Boies Schiller, counsel to Uber Technologies. Paul reviewed the forensic evidence in the case produced by Waymo, and assisted Mr. Laykin in several reports and in preparing to testify in connection with this landmark trade secrets matter. Mr. Laykin was able to opine on the sufficiency of internal forensics examinations conducted by a forensics team within Google LLC following the departure of Anthony Levandowski. Mr. Levandowski was instrumental in developing key technology, particularly laser technology known as LiDAR, used in Google's Waymo self-driving car project. Waymo alleged that Levandowski improperly downloaded thousands of documents related to their driverless vehicle technology and then founded Ottomotto, which Uber subsequently acquired.

**FINRA Arbitration Matter**

On behalf of: Delgado Fernandez LLC

Paul was named as a testifying expert for a major bank in Puerto Rico. The case involved, among other things, allegations of spoliation against the bank by the claimant. Paul conducted an investigation into the document retention practices at the client bank. Paul provided a declaration regarding the operation of the bank's document retention system, subpoena compliance, and the operations of the bank's regulatory and compliance department.

**Copyright Infringement Matter**

On Behalf of: Greensfelder Henker & Gale, P.C.

Consulting expert on behalf of a small developer of gaming industry technology. Our client prevailed and won a multi-million dollar award in an action one of the largest players in the gaming industry for copyright infringement over sales of video slot machine which included copyrighted artwork and graphics belonging to our client. Paul examined the presence of digital elements of the copyrighted material across online distribution channels.

**Theft of Trade Secrets Matter**

On Behalf of: Irell & Manella

Consulting expert on behalf of a gene therapy company and its President, who was accused of misappropriating and improperly using the Plaintiff's trade secrets. Prepared expert reports. The case included analysis of whether certain forensic artifacts and metadata were created by user actions or system activity.

**Theft of Trade Secrets Matter**

On Behalf of: Kelley Drye & Warren

Consulting expert on behalf of a gene therapy company and its President, who was accused of misappropriating and improperly using the Plaintiff's trade secrets. The case included analysis of whether certain forensic artifacts and metadata were created by user actions or system activity.

## List of Major Cases – Consulting and Testifying Expert Experience

Case Number	Case Name
2023-CV-30257	**Hall-Irwin Corporation v. Forestar Real Estate Group, Inc., et al.
654461/2023	**South Beach Tristar 800 LLC v. Lincoln Arts ERFR LLC
30-2020-01141522-CU-BC-NJC	**Asics America Corp. v. Shoebacca, Ltd.
20-CV-1058-JO-DDL	**EpicentRx, Inc. v. Carter
19-04162 SBA	**Carl Zeiss Meditec, Inc. v. Topcon Medical Systems, Inc.
2:2020cv00201	**Strictly F/X LLC v. Pyrotechnico F/X LLC
Judicial Arbitration and Mediation Services Reference No. 01-18-003-13182	*Leibert Corporation v. SVO Building One LLC
Financial Industry Regulatory Authority Case No. 16-02549	**Guillermo Lopez Perez v. Oriental Financial Services Corp. and OFS Securities, Inc. F/K/A BBVA Securities of PR
Judicial Arbitration and Mediation Services Reference No. 1100106192	*Alector, Inc. and Alector LLC v. Asa Abeliovich
Superior Court of the State of California County of Santa Clara Case No. 16-cv-291137	*Agilent Technologies, Inc., a Delaware Corporation v. Twist Bioscience, Corp., a Delaware Corporation; Emily Leproust, an Individual; Siyuan Chen, an Individual, Solage Glaize, an Individual.
Superior Court of the State of California for the County of Santa Clara Case No. 19cv342228	*Sunpower Corporation v. Gabriela Bunea; Standard Industries, Inc.; GAF Energy
Superior Court of the State of California for the County of Santa Clara Case No. 19cv349042	*Sunpower Corporation v. Martin Debono ; Standard Industries, Inc.; GAF Energy

Case Number	Case Name
American Arbitration Association, New York Case No. 01-18-0002-4773	Party City Corporation v. Cayan LLC
United States District Court for the Middle District of Florida Case No. 8:19-cv-2162-T-30CTP	Kirkpatrick Price, Inc. v. Travelers Casualty and Surety Company of America
Superior Court of the State of California for the County of Los Angeles Case No. BC564146	Shailesh Jogani v. Haresh Jogani; J.K. Properties, Inc.; H.K. Realty, Inc.; Commonwealth Investments, Inc.; Mooreport Holdings Limited; Gilu Investments Limited
United States District Court for the Central District of California, Western Division Case No. 2:16-cv-8962(KSx)	Manufacturing Automation & Software Systems, Inc. v. Kristopher Hughes; James Huysentruyt; Informatrac, Inc.; Edward Nugent
United States District Court for the Northern District of Illinois, Eastern Division Case No. 16-cv-8794	GC2 Incorporated v. International Game Technology et al.
Judicial Arbitration and Mediation Services (JAMS) Reference Nos. 1100086069 and 1100086032)	Google LLC v. Anthony Levandowski and Lior Ron
United States District Court for the Northern District of California, San Francisco Case No. 3:17-cv-00939-WHA	*WAYMO LLC (Google) v. Uber Technologies, Inc.; Ottomotto LLC.; Otto Trucking LLC
United States District Court for the Southern District of Florida Case No. 9:16-cv-80502-BB	Justin Bouton v. Ocean Properties, LTD and GHM Jupiter, LLC.
United States District Court for the Western District of Wisconsin Case No. 14-CV-748-WMC	*Epic Systems Corporation v. Tata Consultancy Services Limited, an Indian Corporation; and Tata America International Corporation (dba TCS America), a New York Corporation
United States District Court for the Central District of California, Western Division Case No. 2:14-CV-03326-MMM-PLA	*Excela Creative LLC; Excela MKTG LLC, Telewise LLC dba Stylemined v. Deal Segments LLC dba ChicTreat et al.

\* Cases involving the theft of Trade Secrets and / or Intellectual Property theft; \*\* Named as Testifying Expert.

## Representative Clients

Enterprise/Organization	Service Provided
Construction Company	Testimony, digital forensics
Special Effects Company	Testimony, digital forensics
Construction Company	eDiscovery, forensic collection
Medical Device/Software Company	Testimony, data remediation
Pharmaceutical company	Internal investigation regarding theft of trade secrets
Sports Management Company	eDiscovery, forensic collection
Bankruptcy – Debtors Committee	eDiscovery, forensic collection
California State Agency	eDiscovery, forensic collection
Tata Consultancy Services, Ltd.	Consulting expert, forensic analysis
Professional Recruiting Firm	Forensic analysis
Major Agricultural Company	Consulting expert; spoliation investigation, eDiscovery
Major News Network (Confidential Matter)	Internal Investigation
Major Cloud Services Provider	Software code review in connection with M&A due diligence
Airline Food Services Company	Data analytics in connection with wage & hour litigation
Major Shipping Company	Internal Investigation
Brand Merchandising Company	eDiscovery and forensic collection
Institutional Bank	Internal investigations
Seafood Distributor	eDiscovery and forensic collection
Real Estate Management Firm.	eDiscovery
Major Computer Manufacturer (Confidential Matter)	Internal investigation, eDiscovery and incident response
Private Equity Firm	Information technology due diligence in connection with financial transaction
Pharmaceutical Laboratory	Data analytics in connection with wage & hour litigation
National Real Estate Brokerage Firm	Internal investigation, forensic collection, eDiscovery.
United States Agency	eDiscovery

Enterprise/Organization	Service Provided
Payroll Services Firm	Consulting expert, forensic analysis, eDiscovery
Social Media Company (Confidential Matter).	Consulting expert in data breach matter
Pharmaceutical Company	Consulting expert
Artificial Intelligence Software Company.	eDiscovery, forensic analysis
United States Agency	Consulting expert in data breach investigation
Pharmaceutical Company	eDiscovery
Travelers Casualty and Surety Co.	Consulting expert
Agricultural Equipment Manufacturer	eDiscovery
California Based Health Care Company	eDiscovery
Electric Car Manufacturer	eDiscovery
Supply Chain Management Company	Due diligence code review in connection with M&A transaction
Institutional Trading Platform	Intellectual property due diligence in connection with M&A transaction

## Publications

- **“AI In Politics: How Generative AI is Transforming Campaigns and Elections,”** Kroll AI Blog, September 2024  
<https://www.kroll.com/en/insights/publications/genai-in-politics-and-elections>
- **“Why High-Quality Data is Crucial to Fighting Financial Crime,”** ALM, Law.com July, 2024  
<https://www.law.com/2024/08/22/why-high-quality-ai-data-is-crucial-to-fighting-financial-crime/?sreturn=20240810112334>
- **“Developing Your AI Strategy: Initial Considerations,”** Kroll AI blog, April 2024  
<https://www.kroll.com/en/insights/publications/cyber/developing-ai-business-strategy>
- **“Protecting Against Attacks from the Internet of Things”,** Hong Kong Lawyer, January 2017  
<http://hk-lawyer.org/content/protecting-against-attacks-internet-things>

## Education

**Boston College Law School, Newton, MA**

- Juris Doctor, May 1999

**College of the Holy Cross, Worcester, MA**

- Bachelor of Arts, English, June 1993

## **Bar Admissions**

- State of New York, 2002 (Retired in Good Standing)
- Commonwealth of Massachusetts, 2000 (Inactive)